



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

Certified Mail No.

Activity No.: PER20040005

Agency Interest No. 24083

Mr. Fulkra J. Mason  
Vice President  
Egan Hub Partners, LP  
PO Box 1642  
Houston, TX 77251-1642

RE: Part 70 Operating Permit, Egan Hub Partners, LP - Egan Gas Storage Facility  
Egan Hub Storage LLC, Evangeline, Acadia Parish, Louisiana

Dear Mr. Mason:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 22<sup>nd</sup> of October, 2008, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2006.

Permit No.: 0040-00059-V1

Sincerely,

Chuck Carr Brown Ph.D.

Assistant Secretary

CCB:plh

cc: EPA Region VI

## ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**EGAN HUB PARTNERS, LP / EGAN GAS STORAGE FACILITY**  
**PROPOSED PART 70 AIR OPERATING PERMIT MODIFICATION**

The LDEQ, Office of Environmental Services, is accepting written comments on a Part 70 Air Operating Permit modification for Egan Hub Partners, LP, P.O. Box 1642, Houston, TX 77251-1642 for Egan Gas Storage Facility. **The facility is located at 401 Ida Fruge Road, Evangeline, LA 70537, Acadia Parish.**

Egan Hub Partners, LP, Egan Gas Storage Facility, operates a salt dome natural gas storage facility and compressor station. The facility currently operates under Part 70 Operating Permit No. 0040-00059-V0, dated December 22, 2003.

Egan proposes to retrofit the existing compressor engines (GC-1A/B through GC-7A/B) with oxidation catalyst to reduce CO and VOC emissions. The current emissions cap (GC-CAP) on the compressor engines will be revised into two caps (GC-CAP1 and GC-CAP2) based on horsepower. The caps will use operating hours to limit the potential to emit of NOx emissions below major source threshold for Prevention of Significant Deterioration regulations. Emission limits of NOx and updated requirements from the caps are hereby public noticed to ensure federal enforceability.

Estimated emissions in tons per year after modification are as follows:

<b>Pollutant</b>	<b>Before</b>	<b>After</b>	<b>Change</b>
PM <sub>10</sub>	4.23	13.59	+ 9.36
SO <sub>2</sub>	0.47	4.52	+ 4.05
NO <sub>x</sub>	105.84	186.13	+ 80.29
CO	245.22	57.43	- 187.79
VOC *	113.68	88.13	- 25.55

\*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<b>Pollutant</b>	<b>Emission Rates (TPY)</b>
Acetaldehyde	0.332
Acrolein	0.790
Benzene	1.453
Formaldehyde	2.146
n-Hexane	1.733
Methanol	8.001
Other VOC TAPs	2.462
Total TAPs	16.917

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, March 23, 2006.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit modification application, proposed permit and environmental impact questions (IT questions) are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be reviewed at the Acadia Parish Library - Evangeline Branch located at 1448 Old Evangeline Highway, Evangeline LA 70537

Inquiries or requests for additional information regarding this permit action should be directed to Ms. Pamela Hartley, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3108.

Persons wishing to be included on the LDEQ permit public notice mailing list should contact Ms. Soumaya Ghosn in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3276, or by email at [maillistrequest@ldeq.org](mailto:maillistrequest@ldeq.org).

Permit public notices can be viewed on the LDEQ Permits public Web page at [WWW.deq.state.la.us/news/PubNotice/](http://WWW.deq.state.la.us/news/PubNotice/).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [http://www.state.la.us/ldbc/listservpage/ldeq\\_pn\\_listserv.htm](http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm).

**All correspondence should specify AI Number 24083, Permit Number 0040-00059-V1, and Activity Number PER20040005.**

**Publication Date: Thursday, February 16, 2006.**

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Egan Hub Partners, LP - Egan Gas Storage Facility**  
**Agency Interest No. 24083**  
**Egan Hub Storage, LLC**  
**Evangeline, Acadia Parish, Louisiana**

**I. Background**

Egan Hub Partners, LP, a subsidiary of Duke Energy Gas Transmission, operates a salt dome natural gas storage facility and compressor station, Egan Gas Storage Facility, located at 401 Ida Fruge Road, Evangeline, LA 70537. Construction at the facility started in 1994 under Permit No. 0040-00059-00 issued May 5, 1994, and was completed in phases. Egan Gas Storage Company Inc. (formerly Reliable Natural Gas Company) was the original owner of the facility, then known as LA-1 Gas Storage Facility. A change of ownership occurred from Egan Gas Storage Company, Inc. to Egan Hub Partners, LP on December 20, 1994, with Egan Gas Storage Facility as the facility name. A name change from Egan Hub Partners, LP to Egan Hub Storage, LLC occurred on December 31, 2003.

The facility currently operates under Part 70 Operating Permit No. 0040-00059-V0, dated December 22, 2003. An exemption dated July 30, 2005, authorized a replacement liquids separator to remove liquids from natural gas withdrawn from the salt dome storage. A Case-by-Case notification submitted May 5, 2005, documented replacement of two brine tanks and addition of two more brine tanks. A Letter of No Objection dated June 30, 2005, allowed the installation of a second withdrawal separator.

**II. Origin**

The original application and Emission Inventory Questionnaire (EIQ) dated March 27, 1996, as well as additional information dated January 21, 2002, May 29, 2003, June 16, 2003, July 9, 2003, and July 28, 2003, requested a Part 70 Permit No. 0040-00059-V0.

A modification application and EIQ dated September 7, 2004, and a revised permit application and EIQ dated July 29, 2005, requested a modification of the Part 70 operating permit. Additional information dated February 18, March 16, August 15, September 8, and December 8, 2005, and January 5, 16, and 18, 2006, was also received.

**III. Description**

Egan Gas Storage Facility compresses pipeline natural gas for storage in the Jennings Salt Dome caverns and delivery on demand from storage to pipelines.

Seven (7) gas-fired compressor engines, GC-1 through GC-7, supply the compression required for injection and withdrawal of natural gas to and from the caverns and pipelines. Two parallel filter separators in the pipelines upstream and common to the compressors remove any free liquids and particulate matter from the gas to prevent it from entering the compressors. Withdrawn gas is processed through one of two triethylene glycol (TEG) dehydration (dehy) units, as necessary, to remove excess moisture. A gas-fired reboiler, R-1 or R-2, regenerates the glycol in each unit. Gas from each regenerator overhead still column vent is routed through its individual thermal oxidizer, TO-1 or TO-2, for VOC/HAPs emission control. The thermal oxidizers use natural gas as

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supplemental fuel. Each dehy system incorporates a three-phase separator (flash tank) on the rich glycol stream. The flash gas from these separators is routed as a supplemental fuel to the reboilers and the thermal oxidizers. The reboilers and thermal oxidizers thereby act as control devices for the flash tank with an estimated 95% to 99% efficiency. Any excess flash gas vents through the blowdown vent stack, V-1, to the atmosphere. The blowdown vent emissions rates also include gas releases vented through various vessels and valves.

Under certain conditions, methanol is injected into gas withdrawn from the caverns to prevent hydrate formation. An electric methanol injection pump, MIP-1, and four gas-driven methanol injection pumps, MIP-2 through MTP-5, are used as necessary to minimize hydrate formation. Ordinarily, methanol injection is accomplished with the electric methanol injection pump, with the gas-driven pumps used for low volume withdrawals, approximately 10-15% of the time.

The dry natural gas proceeds to the pipeline via metering equipment. If system pressure is insufficient to propel the gas through the pipeline, the gas will be routed to the facility's compressors.

Other sources of emissions include truck loading losses, F-1A, F-1B, and F-1C; plant fugitives, F-2; storage tanks, T-1 through T-12; and the emergency generator, DG-1. Tank T-5 is used to store methanol. Tank T-7 is used to store miscellaneous liquids containing hydrocarbons and/or water from the waste streams flowing into the oily water sump and from the separator drain header. Separated wastewater is periodically removed from Tank T-7 for off-site disposal. Also onsite are five emergency generator engines of 11 hp each, which are operated less than 500 hours per year.

Egan Hub Partners LP proposes an expansion project with the installation of 28,348 bhp of additional gas-fired compression and changes to several sources affected by the new equipment. The company also includes in this permit activities previously authorized by LDEQ. This permit includes the following modifications for Egan Gas Storage Facility:

- Addition of two natural gas-fired turbines (GC-8 and GC-9), 14,174 bhp each (13,333 hp @ ISO standard, 60% relative humidity) with oxidation catalyst to reduce CO and VOC emissions;
- Retrofit of the existing compressor engines (GC-1A/B through GC-7A/B) with oxidation catalyst to reduce CO and VOC emissions;
- Revision of the emissions cap (GC-CAP) on the compressor engines into two caps (GC-CAP1 and GC-CAP2) based on horsepower and changes to the compressor emissions;
- Addition of a Parts Washer (PW-1), Pipeline Liquids Truck Loading Area (F-1D) and a Pipeline Liquids Storage Tank (T-13);
- Revision of Piping Component Fugitives (F-2) to include components from new equipment;

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- Update of emissions from the Emergency Generator Engine (DG-1);
- Update of emission rates from the Methanol Injection Pumps (MIP-2 through MIP-5);
- Revision of emission rates from the Methanol Storage Tank (T-5), Oily Water Storage Tank (renamed T-7), and Methanol/Water Mixture Storage Tank (T-12) based on operating experience for reductions in maximum throughput and inclusion of flash gases;
- Incorporation of two replacement Brine Storage Tanks (T-8A and T-8B) and two new Brine Storage Tanks (T-8C and T-8D) authorized under case-by-case notification submitted May 5, 2005;
- Revision of truck loading emissions for the Oily Water Loading (F-1A) and Methanol/Water Mixture Loading (F-1C);
- Update of emission rates from the Dehy Reboilers (R-1 and R-2) to account for increase in maximum throughput and emissions associated with Gas Release Events (V-1) due to the proposed expansion;
- Reconciliation of emissions from the Dehy Thermal Oxidizers (TO-1 and TO-2) to account for a greater destruction efficiency, 99.9% DRE versus 99% DRE, on the installed TO-2 and to incorporate potential emissions from methanol in the gas streams based on new estimation methodology; and
- Inclusion of CAM requirements on the seven compressors and the two thermal oxidizers.

To ensure the catalytic oxidation control device is functioning properly on each compressor, Egan will monitor the catalyst bed inlet and outlet gas temperature. The thermal oxidizer TO-1 operates at 1700 F to incinerate the noncondensable VOC and HAPs with an estimated 99.0 % efficiency. The thermal oxidizer TO-2 operates at 1500 F to incinerate the noncondensable VOC and HAPs with an estimated 99.9% efficiency. The combustion chamber temperature of each thermal oxidizer is to be monitored daily with a thermocouple to provide reasonable assurance that combustion of the vapors is occurring.

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**Egan Hub Storage, LLC**  
**Evangeline, Acadia Parish, Louisiana**

Estimated emissions in tons per year after modification are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	4.23	13.59	+ 9.36
SO <sub>2</sub>	0.47	4.52	+ 4.05
NO <sub>x</sub>	105.84	186.13	+ 80.29
CO	245.22	57.43	- 187.79
VOC *	113.68	88.13	- 25.55

\* VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Emission Rates (TPY)
1,3-Butadiene	0.105
2,2,4-Trimethylpentane	0.104
2-Methylnaphthalene	0.010
Acetaldehyde	0.332
Acrolein	0.790
Benzene	1.453
Ethylbenzene	0.146
Formaldehyde	2.146
n-Hexane	1.733
Methanol	8.001
Naphthalene	0.037
Polynuclear Aromatic Hydrocarbons	0.012
Propylene Oxide	0.054
Toluene	1.309
Xylene	0.685
Total TAPs	16.917
Other VOC (TPY):	71.213

#### **IV. Type of Review**

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations. Prevention of Significant Deterioration does not apply.

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. The two glycol dehydrators are subject to, but come under exemption from control requirements of NESHAP, 40 CFR 63, Subparts HHH, per 63.1274 (d)(2).

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NESHAP, 40 CFR 63 Subpart ZZZZ - Reciprocating Internal Combustion Engines (RICE) does not apply, per 63.6590 (b)(3); all the compressors are existing 4-stroke lean-burn engines. In addition, the retrofit of the existing compressors engines with oxidation catalyst will be completed prior to the first compliance date for this subpart (June 15, 2007), and will make the facility an area source.

The new turbines are subject to NSPS, 40 CFR 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines, upon its promulgation, which will supersede requirements of 40 CFR 60 Subpart GG.. Due to the retrofit of the existing compressors engines with oxidation catalyst, the facility will be a minor source of HAPs prior to the construction of the turbines; therefore, NESHAP, 40 CFR 63, Subpart YYYY - Stationary Combustion Turbines, will not apply because the turbines will be constructed after the facility reduces emissions below threshold levels.

**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on Permit No. 0040-00059-V0 was published in *The Advocate*, Baton Rouge, on September 11, 2003, and in *The Crowley Post Signal*, Crowley, on September 11, 2003, and submitted to the Acadia Parish Library on September 9, 2003. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on September 9, 2003. The draft permit was also submitted to US EPA Region VI on September 4, 2003 (e-mailed). No comments were received.

A 30 day notice requesting public comment on modifications of the federally enforceable conditions in the permit was published in *The Advocate*, Baton Rouge, on <date>, 2005; and in the <local paper>, <local town>, on <date>, 2005. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>, 2005. All comments will be considered prior to the final permit decision.

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**VII. Effects on Ambient Air**

Dispersion Model(s) Used: <None>

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
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**VIII. General Condition XVII Activities**

Work Activity	Schedule	PM <sub>10</sub>	Emission Rates - tons		
			SO <sub>2</sub>	NO <sub>X</sub>	CO
NA					VOC

**IX. Insignificant Activities**

ID No.:	Description	Citation
T-1	Engine Oil Tank 1,600 gals	LAC 33:III.501.B.5.A.3
T-2	Compressor Oil Tank 2,000 gals	LAC 33:III.501.B.5.A.3
T-3	Lubricating Oil Tank 1,600 gals	LAC 33:III.501.B.5.A.3
T-4	Diesel Tank 8,800 gals	LAC 33:III.501.B.5.A.3
T-6	Engine Coolant Tank 1,600 gals	LAC 33:III.501.B.5.A.3
T-8	Diesel Tank 2,000 gals	LAC 33:III.501.B.5.A.3
T-9A	Fresh Water Tank 2,000 gals	LAC 33:III.501.B.5.A.3
T-9B	Fresh Water Tank 2,000 gals	LAC 33:III.501.B.5.A.3
T-10	Triethylene Glycol Tank 8,800 gals	LAC 33:III.501.B.5.A.3
T-11	Diesel Tank 2,000 gals	LAC 33:III.501.B.5.A.3
SHTR-01	Space Heater 0.096 MM BTU/hr	LAC 33:III.501.B.5.A.1

**TABLE 1. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS**

Egan Hub Partners, LP - Egan Gas Storage Facility  
Agency Interest No. 24083  
Egan Hub Storage, LLC  
Evangeline, Acadia Parish, Louisiana

ID No.	Description	LAC 33.III																	
		5*	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	2122	22	29*	51*	56	59
GRP 5	Entire Facility		1	1					2					1			3	3	3
EQT 1	DG-1 - Emergency Generator Engine (EG-035)																		
EQT 2	GC-1A/B - Gas Compressor Engine (EG-100)	1																	
EQT 3	GC-2A/B - Gas Compressor Engine (EG-200)	1																	
EQT 4	GC-3A/B - Gas Compressor Engine (EG-300)	1																	
EQT 5	GC-4A/B - Gas Compressor Engine (EG-400)	1																	
EQT 6	GC-5A/B - Gas Compressor Engine (EG-500)	1																	
EQT 7	GC-6A/B - Gas Compressor Engine (EG-600)	1																	
EQT 8	GC-7A/B - Gas Compressor Engine (EG-700)	1																	
EQT 9	GG-1 - Emergency Generator Engine (EG-036)	1																	
EQT 10	GG-2 - Emergency Generator Engine (EG-037)	1																	
EQT 11	GG-3 - Emergency Generator Engine (EG-038)	1																	
EQT 12	GG-4 - Emergency Generator Engine (EG-039)	1																	
EQT 13	GG-5 - Emergency Generator Engine (EG-040)	1																	
EQT 14	R-1 - Dehy Reboiler (RB-01)																		
EQT 15	R-2 - Dehy Reboiler (RB-02)																		
EQT 18	MIP-2 - Methanol Injection Pump																		
EQT 19	MIP-3 - Methanol Injection Pump																		

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Egan Hub Partners, LP - Egan Gas Storage Facility  
 Agency Interest No. 24083  
**Egan Hub Storage, LLC**  
**Evangeline, Acadia Parish, Louisiana**

ID No.	Description	LAC 33:III																
		5*	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	2122	22	29*	51*	56
EQT 20	MIP-4 - Methanol Injection Pump																	
EQT 21	MIP-5 - Methanol Injection Pump																	
EQT 22	T-5 - Methanol Storage Tank																	
EQT 23	T-7 - Oily Water Storage Tank																	
EQT 24	T-8A - Brine Storage Tank																	
EQT 25	T-8B - Brine Storage Tank																	
EQT 26	T-12 - Methanol/Water Mixture Storage Tank																	
EQT 27	F-1A - Oily Water Truck Loading Area (TL1)																	
EQT 28	F-1B - Lubricating Oil Truck Loading Area (TL2)																	
EQT 29	F-1C - Methanol/Water Mixture Truck Loading Area (TL3)																	
EQT 34	F-1D - Pipeline Liquids Truck Loading Area (TL4)																	
EQT 35	FT-1 - Dehydration Unit No. 1 Flash Tank																	
EQT 36	FT-2 - Dehydration Unit No. 2 Flash Tank																	
EQT 40	PW-1 - Parts Washer																	
EQT 41	SV-1 - Dehydration Unit No. 1 Regenerator Still Vent															1	2	
EQT 42	SV-2 - Dehydration Unit No. 2 Regenerator Still Vent															1	2	
EQT 43	T-13 - Pipeline Liquids Storage Tank															1		

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**Egan Hub Partners, LP - Egan Gas Storage Facility**  
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**Egan Hub Storage, LLC**  
**Evangeline, Acadia Parish, Louisiana<sup>a</sup>**

ID No.	Description	LAC 33:III																
		5*	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	2122	22	29*	51*	56
EQT 44	T-8C - Brine Storage Tank																	
EQT 45	T-8D - Brine Storage Tank																	
EQT 46	TO-1 - Dehy Thermal Oxidizer (TO-01)								1	1	2							
EQT 47	TO-2 - Dehy Thermal Oxidizer (TO-02)								1	1	2							
EQT 48	V-1 - Gas Release Events														1	2		
EQT 49	GC-8 - Gas-Fired Turbine (EG-800)								1	1	2							
EQT 50	GC-9 - Gas-Fired Turbine (EG-900)								1	1	2							
FUG 1	F-2 - Piping Component Fugitives														1			
GRP 3	GC-CAP1 - Compressor Engine CAP (GC-1A/B & GC-2A/B)																	
GRP 6	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)																	

\* The regulations indicated above are State Only regulations.

**KEY:**

1. The regulations have applicable requirements, which apply to this particular emission source. The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
2. The regulations have applicable requirements, which apply to this particular emission source, but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
3. The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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**Egan Hub Partners, LP - Egan Gas Storage Facility**  
 Agency Interest No. 24083  
**Egan Hub Storage, LLC**  
**Evangeline, Acadia Parish, Louisiana**

ID No.	Description	40 CFR 60				40 CFR 61				40 CFR 63				40 CFR Part ZZZZ						
		A	Dc	K	Ka	Kb	GG	KKK	KKKK	A	M	V	FF	A	HHH	YYYY	ZZZZ	64	68	70
GRP 5	Entire Facility									1				2		3		3	3	1
EQT 1	DG-1 - Emergency Generator Engine (EG-035)									1										
EQT 2	GC-1A/B - Gas Compressor Engine (EG-100)																			
EQT 3	GC-2A/B - Gas Compressor Engine (EG-200)																			
EQT 4	GC-3A/B - Gas Compressor Engine (EG-300)																			
EQT 5	GC-4A/B - Gas Compressor Engine (EG-400)																			
EQT 6	GC-5A/B - Gas Compressor Engine (EG-500)																			
EQT 7	GC-6A/B - Gas Compressor Engine (EG-600)																			
EQT 8	GC-7A/B - Gas Compressor Engine (EG-700)																			
EQT 9	GG-1 - Emergency Generator Engine (EG-036)																			
EQT 10	GG-2 - Emergency Generator Engine (EG-037)																			
EQT 11	GG-3 - Emergency Generator Engine (EG-038)																			
EQT 12	GG-4 - Emergency Generator Engine (EG-039)																			
EQT 13	GG-5 - Emergency Generator Engine (EG-040)																			
EQT 14	R-1 - Dehy Reboiler (RB-01)																	2		
EQT 15	R-2 - Dehy Reboiler (RB-02)																	2		
EQT 18	MIP-2 - Methanol Injection Pump																			

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 Egan Hub Storage, LLC  
 Evangeline, Acadia Parish, Louisiana

ID No.	Description	40 CFR 60					40 CFR 61					40 CFR 63					40 CFR Part				
		A	Dc	K	Ka	Kb	GG	KKK	KKKK	A	M	V	FF	A	HHH	YYYY	ZZZZ	64	68	70	
EQT 19	MIP-3 - Methanol Injection Pump																				
EQT 20	MIP-4 - Methanol Injection Pump																				
EQT 21	MIP-5 - Methanol Injection Pump																				
EQT 22	T-5 - Methanol Storage Tank																				
EQT 23	T-7 - Oily Water Storage Tank																				
EQT 24	T-8A - Brine Storage Tank																				
EQT 25	T-8B - Brine Storage Tank																				
EQT 26	T-12 - Methanol/Water Mixture Storage Tank																				
EQT 27	F-1A - Oily Water Truck Loading Area (TL1)																				
EQT 28	F-1B - Lubricating Oil Truck Loading Area (TL2)																				
EQT 29	F-1C - Methanol/Water Mixture Truck Loading Area (TL3)																				
EQT 34	F-1D - Pipeline Liquids Truck Loading Area (TL4)																				
EQT 35	FT-1 - Dehydration Unit No. 1 Flash Tank																	2			
EQT 36	FT-2 - Dehydration Unit No. 2 Flash Tank																	2			
EQT 40	PW-1 - Parts Washer																				
EQT 41	SV-1 - Dehydration Unit No. 1 Regenerator Still Vent																	2			
EQT 42	SV-2 - Dehydration Unit No. 2 Regenerator Still Vent																	2			
EQT 43	T-13 - Pipeline Liquids Storage Tank																	3			

**TABLE 1. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS**

**Egan Hub Partners, LP - Egan Gas Storage Facility**  
**Agency Interest No. 24083**  
**Egan Hub Storage, LLC**  
**Evangeline, Acadia Parish, Louisiana**

ID No.	Description	40 CFR 60				40 CFR 61				40 CFR 63				40 CFR Part 64						
		A	Dc	K	Ka	Kb	GG	KKK	KKKK	A	M	V	FF	A	HHH	YYYY	ZZZZ	64	68	70
EQT 44	T-8C - Brine Storage Tank																			
EQT 45	T-8D - Brine Storage Tank																			
EQT 46	TO-1 - Dehy Thermal Oxidizer (TO-01)																			
EQT 47	TO-2 - Dehy Thermal Oxidizer (TO-02)																			
EQT 48	V-1 - Gas Release Events																			
EQT 49	GC-8 - Gas-Fired Turbine (EG-800)																			
EQT 50	GC-9 - Gas-Fired Turbine (EG-900)																			
FUG 1	F-2 - Piping Component Fugitives																			
GRP 3	GC-CAP1 - Compressor Engine CAP (GC-1A/B & GC-2A/B)																			
GRP 6	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)																			

**KEY:**

1. The regulations have applicable requirements, which apply to this particular emission source. The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
2. The regulations have applicable requirements, which apply to this particular emission source, but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
3. The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

**TABLE 2. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS  
EXPLANATION FOR EXEMPTION STATUS OR NON-APPLICABILITY OF A SOURCE**

Egan Hub Partners, LP - Egan Gas Storage Facility  
 Agency Interest No. 24083  
 Egan Hub Storage, LLC  
 Evangeline, Acadia Parish, Louisiana

ID No:	Requirement	Notes
Facility	Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines (RICE) [40 CFR 63]	DOES NOT APPLY. Per 63.6590 (b)(3), compressors are existing 4-stroke lean-burn engines. In addition, the retrofit of the existing compressors engines with oxidation catalyst will be completed prior to the first compliance date for this subpart (June 15, 2007), and will make the facility an area source.
	Subpart YYYY - National Emission Standards for Hazardous Air Pollutants from Stationary Combustion Turbines [40 CFR 63]	DOES NOT APPLY. Due to the retrofit of the existing compressors engines with oxidation catalyst, the facility will be a minor source of HAPs prior to the construction of the turbines; therefore, Subpart YYYY, will not apply. because the turbines will be constructed after the facility reduces emissions below threshold levels.
	Chemical Accident Prevention Provisions [40 CFR 68]	DOES NOT APPLY. Per LAC 33:III.5907, facility does not produce, process, handle, or store any substance listed in 40 CFR 68.130 or Tables 59.0 and 59.1 of Chapter 59 in an amount greater than the threshold quantity.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.Chapter 59]	
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.Chapter 51]	DOES NOT APPLY. Per LAC 33:III.5101.A, facility is not a major source for Toxic Air Pollutants (TAPs).
	Odor Regulations [LAC 33:III.Chapter 29]	DOES NOT APPLY. Per LAC 33:III.2901.B, facility is not a source of odorous substances emitted into the ambient air.

**TABLE 2. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS  
EXPLANATION FOR EXEMPTION STATUS OR NON-APPLICABILITY OF A SOURCE**

Egan Hub Partners, LP - Egan Gas Storage Facility  
 Agency Interest No. 24083  
 Egan Hub Storage, LLC  
 Evangeline, Acadia Parish, Louisiana

ID No:	Requirement	Notes
Facility (Cont.)	Control of Emissions of Nitrogen Oxides (NOx) [LAC 33:III.2201.B]	DOES NOT APPLY. Per LAC 33:III.2201.B, facility is outside the Baton Rouge Nonattainment Area and Region of Influence
	Fugitive Emission Control for Ozone Nonattainment Areas and Specified Parishes [LAC 33:III.2122]  Crude Oil and Condensate [LAC 33:III.2104]	DOES NOT APPLY. Facility does not meet the definition of a natural gas processing plant.  DOES NOT APPLY. Per LAC 33:III.2104.A, potential flash emissions are less than 100 TPY.
Facility Dehydration Unit No. 1 and No. 2	Subpart HHH - National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Transmission and Storage Facilities [40 CFR 63]	EXEMPT. Per 40 CFR 63.1274(d)(2), by using the method described in 40 CFR 63.1282(a)(2)(i), facility exempt from 40 CFR 63.1275 control requirements, monitoring under 40 CFR 63.1283, and recordkeeping/reporting under 40 CFR 63.1284 and 1285.  Maintain the records as required to demonstrate exemption from controls per under 40 CFR 63.1284(d)(2)
EQT 1 thru 15, 46, 47, 49, & 50  Natural Gas combustion units	Emission Standards for Volatile Organic Compounds (VOCs) – Glycol Dehydrators [LAC 33:III.2116]  Emission Standards for Sulfur Dioxide Emission Limitations [LAC 33:III.1503.C]  Emission Standards for Sulfur Dioxide Recordkeeping and Reporting [LAC 33:III.1513]	DOES NOT APPLY. Per LAC 33:III.2116.A.2. Permit No. 0040-000059-00 issued May 4 1994, required sources to install controls according to LAC 33:III.2115  EXEMPT. Units emit <250 tons of SO <sub>2</sub> per year. Record and retain at the site for at least 2 years the data required to demonstrate compliance with or exemption from SO <sub>2</sub> standards of Chapter 15. Compliance data shall be reported annually in accordance with LAC 33:III.918.

**TABLE 2. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS  
EXPLANATION FOR EXEMPTION STATUS OR NON-APPLICABILITY OF A SOURCE**

Egan Hub Partners, LP - Egan Gas Storage Facility  
 Agency Interest No. 24083  
 Egan Hub Storage, LLC  
 Evangeline, Acadia Parish, Louisiana

ID No:	Requirement	Notes
EQT 24, 25, 44, & 45 T-8A thru T-8C Brine Tanks	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	EXEMPT. Storage Vessels are exempt from control requirements as the true vapor pressure is less than 3.5 kPa (0.5 psia) The facility shall maintain records per 40 CFR 60.116b(a) and (b)
EQT 22, 23, 26, & 43 Storage Tanks	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Capacity of each tank <75 m <sup>3</sup> (19,813 gallons)
EQT 27 & 28 F-1A & F-1B Truck Loading	Emission Standards for Volatile Organic Compounds (VOCs) – Loading [LAC 33..III.2107]	DOES NOT APPLY. Loading only VOCs having a true vapor pressure <1.5 psia into trucks at this facility.
EQT 29 & 30 F-1C & F-1D	Emission Standards for Volatile Organic Compounds (VOCs) – Loading [LAC 33..III.2107]	DOES NOT APPLY. Loading < 20,000 gallons throughput per day (30-day period average) into trucks at this facility.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Table 1 above of this permit.

## **40 CFR PART 70 GENERAL CONDITIONS**

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
  1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
  2. have access to and copy, at reasonable times, any records that must be kept under the

## 40 CFR PART 70 GENERAL CONDITIONS

conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];

3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]

I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.

[Reference 40 CFR 70.6(a)(3)(ii)(B)]

J. Records of required monitoring shall include the following:

1. the date, place as defined in the permit, and time of sampling or measurements;
2. the date(s) analyses were performed;
3. the company or entity that performed the analyses;
4. the analytical techniques or methods used;
5. the results of such analyses; and
6. the operating conditions as existing at the time of sampling or measurement.

[Reference 40 CFR 70.6(a)(3)(ii)(A)]

K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]

L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the

## 40 CFR PART 70 GENERAL CONDITIONS

communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
  1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
  4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
  5. changes in emissions would not qualify as a significant modification; and

## 40 CFR PART 70 GENERAL CONDITIONS

6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
  1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in

## 40 CFR PART 70 GENERAL CONDITIONS

### Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the original application and Emission Inventory Questionnaire (EIQ) dated March 27, 1996, with additional information dated January 21, 2002, May 29, 2003, June 16, 2003, July 9, 2003, and July 28, 2003; the modification application and EIQ dated September 7, 2004, and a revised permit application and EIQ dated July 29, 2005, with additional information dated February 18, March 16, August 15, September 8, and December 8, 2005, and January 5, 16, and 18, 2006.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.  
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.

## **LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS**

- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
  - 1. Report by June 30 to cover January through March
  - 2. Report by September 30 to cover April through June
  - 3. Report by December 31 to cover July through September
  - 4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
  - 1. Description of noncomplying emission(s);
  - 2. Cause of noncompliance;
  - 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
  - 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
  - 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

**LOUISIANA AIR EMISSION PERMIT**  
**GENERAL CONDITIONS**

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]
- These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.
- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

## General Information

AI ID: 24083 Egan Hub Partners LP - Egan Gas Storage Facility  
 Activity Number: PER20040005  
 Permit Number: 0040-00059-V1  
 Air - Title V Regular Permit Minor Mod

<u>General Information</u>					
Also Known As:	ID	Name	User Group	Start Date	
		Egan Hub Storage LLC	Air Permitting	12-20-1994	
		Egan Hub Storage LLC	Air Permitting	12-31-2003	
		Duke Energy Gas Transmission (parent/operator)	Air Permitting	08-30-2000	
		Egan Natural Gas Storage Facility	Air Permitting	12-20-1994	
		Egan Gas Storage Facility (aka)	Air Permitting	04-05-1995	
	0040-00059	Egan Natural Gas Storage Facility	CDS Number	08-05-2002	
	LAR000053587	MHP- Egan	Emission Inventory	02-19-2004	
	LAR108862	LPDES Permit #	Hazardous Waste Notification	11-24-2003	
	45297	Egan Hub Partners LP	LPDES Permit #	06-03-2002	
	45341	Egan Hub Partners LP	TEMPO Merge	04-13-2003	
			TEMPO Merge	04-13-2003	
			Main Phone:	3378246100	
Physical Location:		401 Ida Fruge Rd Evangeline, LA 70537			
Mailing Address:		PO Box 125 Evangeline, LA 705370125			
Location of Front Gate:		30° 15' 34" latitude, 92° 34' 24" longitude. Coordinate Method: Interpolation - Map. Coordinate Datum: NAD27			
Related People:		Name	Mailing Address	Phone (Type)	Relationship
		Kim Chesler	5400 Westheimer Court SP 775 Houston, TX 77056		Water Billing Party for
		Christopher T. Ditzel	PO Box 1642 Houston, TX 772511642		Air Permit Contact For
		Don Haney	401 Ida Fruge Rd Evangeline, LA 70537		Haz. Waste Billing Party for
		Fulkra J. Mason	PO Box 1642 Houston, TX 772511642		Responsible Official for
Related Organizations:		Name	Address	Phone (Type)	Relationship
		Egan Hub Storage LLC	PO Box 1642 Houston, TX 772521642		Air Billing Party for
		Egan Hub Storage LLC	PO Box 1642 Houston, TX 772521642		Owns
		Egan Hub Storage LLC	PO Box 1642 Houston, TX 772521642		Operates
SIC Codes:		4922, Natural gas transmission			

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

## INVENTORIES

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility  
 Activity Number: PER20040005  
 Permit Number: 0040-00059-V1  
 Air - Title V Regular Permit Minor Mod

### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT001	DG-1 - Emergency Generator Engine (EG-035)	445 horsepower	424 horsepower		500 hr/yr (All Year)	
EQT002	GC-1A/B - Gas Compressor Engine (EG-100)	3287 horsepower	3130 horsepower		8760 hr/yr (All Year)	
EQT003	GC-2A/B - Gas Compressor Engine (EG-200)	3287 horsepower	3130 horsepower		8760 hr/yr (All Year)	
EQT004	GC-3A/B - Gas Compressor Engine (EG-300)	4667 horsepower	4445 horsepower		8760 hr/yr (All Year)	
EQT005	GC-4A/B - Gas Compressor Engine (EG-400)	4667 horsepower	4445 horsepower		8760 hr/yr (All Year)	
EQT006	GC-5A/B - Gas Compressor Engine (EG-500)	4667 horsepower	4445 horsepower		8760 hr/yr (All Year)	
EQT007	GC-6A/B - Gas Compressor Engine (EG-600)	4667 horsepower	4445 horsepower		8760 hr/yr (All Year)	
EQT008	GC-7A/B - Gas Compressor Engine (EG-700)	4667 horsepower	4445 horsepower		8760 hr/yr (All Year)	
EQT009	GG-1 - Emergency Generator Engine (EG-036)	11 horsepower	.09 MM BTU/hr		500 hr/yr (All Year)	
EQT010	GG-2 - Emergency Generator Engine (EG-037)	11 horsepower	.09 MM BTU/hr		500 hr/yr (All Year)	
EQT011	GG-3 - Emergency Generator Engine (EG-038)	11 horsepower	.09 MM BTU/hr		500 hr/yr (All Year)	
EQT012	GG-4 - Emergency Generator Engine (EG-039)	11 horsepower	.09 MM BTU/yr		500 hr/yr (All Year)	
EQT013	GG-5 - Emergency Generator Engine (EG-040)	11 horsepower	.09 MM ft^3/hr		500 hr/yr (All Year)	
EQT014	R-1 - Dehy Reboiler (RB-01)	3 MM BTU/hr	2.9 MM BTU/hr		8760 hr/yr (All Year)	
EQT015	R-2 - Dehy Reboiler (RB-02)	9.4 MM BTU/hr	8.9 MM BTU/hr		8760 hr/yr (All Year)	
EQT018	MIP-2 - Methanol Injection Pump	125 scf/hr	125 scf/hr		510 hr/yr (All Year)	
EQT019	MIP-3 - Methanol Injection Pump	125 scf/hr	125 scf/hr		510 hr/yr (All Year)	
EQT020	MIP-4 - Methanol Injection Pump	125 scf/hr	125 scf/hr		510 hr/yr (All Year)	
EQT021	MIP-5 - Methanol Injection Pump	125 scf/hr	125 scf/hr		510 hr/yr (All Year)	
EQT022	T-5 - Methanol Storage Tank	16800 gallons	235200 gallons/yr	235200 gallons/yr	Methanol	8760 hr/yr (All Year)
EQT023	T-7 - Oily Water Storage Tank	16800 gallons	201600 gallons/yr	201600 gallons/yr	Oily Water	8760 hr/yr (All Year)
EQT024	T-8A - Brine Storage Tank	2'00000 gallons	2628 MM ft^3/yr	2628 MM ft^3/yr	Brine	8760 hr/yr (All Year)
EQT025	T-8B - Brine Storage Tank	2'00000 gallons	2628 MM ft^3/yr	2628 MM ft^3/yr	Brine	8760 hr/yr (All Year)
EQT026	T-12 - Methanol/Water Mixture Storage Tank	8800 gallons	35040 gallons/yr	35040 gallons/yr	Methanol/Water Mixture	8760 hr/yr (All Year)
EQT027	F-1A - Miscellaneous Liquids Truck Loading Areas (TL1)		201600 gallons/yr	15000 gallons/hr	Miscellaneous Liquids	13.5 hr/yr (All Year)
EQT028	F-1B - Lubricating Oil Truck Loading Area (TL2)		32000 gallons/yr	16000 gallons/hr	Lube Oil	20 hr/yr (All Year)
EQT029	F-1C - Methanol/Water Mixture Truck Loading Area (TL3)		35040 gallons/yr	8800 gallons/hr	Methanol/Water Mixture	3.98 hr/yr (All Year)
EQT034	F-1D - Pipeline Liquids Truck Loading Area (TL4)		43800 gallons/yr	8800 gallons/hr	Pipeline Liquids	4.98 hr/yr (All Year)
EQT035	FT-1 - Dehydration Unit No. 1 Flash Tank	832 scf/hr	832 scf/hr		8760 hr/yr (All Year)	
EQT036	FT-2 - Dehydration Unit No. 2 Flash Tank	2930 scf/hr	2930 scf/hr		8760 hr/yr (All Year)	
EQT040	PW-1 - Parts Washer		Not applicable	Safety-Kleen Solvent or equivalent	8760 hr/yr (All Year)	
EQT041	SV-1 - Dehydration Unit No. 1 Regenerator Still Vent	252 MM ft^3/day	252 MM ft^3/day		8760 hr/yr (All Year)	
EQT042	SV-2 - Dehydration Unit No. 2 Regenerator Still Vent	640 MM ft^3/day	640 MM ft^3/day		8760 hr/yr (All Year)	
EQT043	T-13 - Pipeline Liquids Storage Tank	8800 gallons	43800 gallons/yr	43800 gallons/yr	Pipeline Liquids	8760 hr/yr (All Year)
EQT044	T-8C - Brine Storage Tank	2'00000 gallons	2628 MM ft^3/yr	2628 MM ft^3/yr	Brine	8760 hr/yr (All Year)
EQT045	T-8D - Brine Storage Tank	2'00000 gallons	2628 MM ft^3/yr	2628 MM ft^3/yr	Brine	8760 hr/yr (All Year)
EQT046	TO-1 - Deny Thermal Oxidizer (TO-01)	2 MM BTU/hr	1.9 MM BTU/hr	Natural Gas Fired	8760 hr/yr (All Year)	

## INVENTORIES

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT047	TO-2 - Dehy Thermal Oxidizer (TO-02)	8 MM BTU/hr	7.7 MM BTU/hr			8760 hr/yr (All Year)
EQT048	V-1 - Gas Release Events	308000 ft^3/hr	2538 ft^3/hr		NG Releases from Vessels, Valves	4004 hr/yr (All Year)
EQT049	GC-8 - Gas-Fired Turbine (EG-800)	120 MM BTU/hr	14174 horsepower		Natural Gas	8760 hr/yr (All Year)
EQT050	GC-9 - Gas-Fired Turbine (EG-900)	120 MM BTU/hr	14174 horsepower		Natural Gas	8760 hr/yr (All Year)
FUG001	F-2 - Piping Component Fugitives	Not applicable				8760 hr/yr (All Year)

### Subject Item Groups:

ID	Description	Included Components (from Above)
GRP003	GC-CAP1 - Compressor Engine CAP 1 (GC-1A/B & GC-2A/B)	EQT2 GC-1A/B - Gas Compressor Engine (EG-100)
GRP003	GC-CAP1 - Compressor Engine CAP 1 (GC-1A/B & GC-2A/B)	EQT3 GC-2A/B - Gas Compressor Engine (EG-200)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT1 DG-1 - Emergency Generator Engine (EG-035)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT2 GC-1A/B - Gas Compressor Engine (EG-100)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT3 GC-2A/B - Gas Compressor Engine (EG-200)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT4 GC-3A/B - Gas Compressor Engine (EG-300)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT5 GC-4A/B - Gas Compressor Engine (EG-400)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT6 GC-5A/B - Gas Compressor Engine (EG-500)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT7 GC-6A/B - Gas Compressor Engine (EG-600)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT8 GC-7A/B - Gas Compressor Engine (EG-700)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT9 GG-1 - Emergency Generator Engine (EG-036)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT10 GG-2 - Emergency Generator Engine (EG-037)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT11 GG-3 - Emergency Generator Engine (EG-038)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT12 GG-4 - Emergency Generator Engine (EG-039)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT13 GG-5 - Emergency Generator Engine (EG-040)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT14 R-1 - Dehy Reboiler (RB-01)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT15 R-2 - Dehy Reboiler (RB-02)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT18 MIP-2 - Methanol Injection Pump
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT19 MIP-3 - Methanol Injection Pump
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT20 MIP-4 - Methanol Injection Pump
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT21 MIP-5 - Methanol Injection Pump
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT22 T-5 - Methanol Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT23 T-7 - Oily Water Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT24 T-8A - Brine Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT25 T-8B - Brine Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT26 T-12 - Methanol/Water Mixture Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT27 F-1A - Miscellaneous Liquids Truck Loading Areas (TL1)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT28 F-1B - Lubricating Oil Truck Loading Area (TL2)

## INVENTORIES

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### Subject Item Groups:

ID	Description	Included Components (from Above)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT29 F-1C - Methanol/Water Mixture Truck Loading Area (TL3)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT34 F-1D - Pipeline Liquids Truck Loading Area (TL4)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT35 FT-1 - Dehydration Unit No. 1 Flash Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT36 FT-2 - Dehydration Unit No. 2 Flash Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT40 PW-1 - Parts Washer
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT41 SV-1 - Dehydration Unit No. 1 Regenerator Still Vent
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT42 SV-2 - Dehydration Unit No. 2 Regenerator Still Vent
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT43 T-13 - Pipeline Liquids Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT44 T-8C - Brine Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT45 T-8D - Brine Storage Tank
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT46 TO-1 - Dehy Thermal Oxidizer (TO-01)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT47 TO-2 - Dehy Thermal Oxidizer (TO-02)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT48 V-1 - Gas Release Events
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT49 GC-8 - Gas-Fired Turbine (EG-800)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	EQT50 GC-9 - Gas-Fired Turbine (EG-900)
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	FUG1 F-2 - Piping Component Flights
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility	GRP3 GC-CAP1 - Compressor Engine CAP 1 (GC-1A/B & GC-2A/B)
GRP006	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)	EQT4 GC-3A/B - Gas Compressor Engine (EG-300)
GRP006	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)	EQT5 GC-4A/B - Gas Compressor Engine (EG-400)
GRP006	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)	EQT6 GC-5A/B - Gas Compressor Engine (EG-500)
GRP006	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)	EQT7 GC-6A/B - Gas Compressor Engine (EG-600)
GRP006	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)	EQT8 GC-7A/B - Gas Compressor Engine (EG-700)

### Relationships:

Subject Item	Relationship	Subject Item
EQT14 R-1- Dehy Reboiler (RB-01)	Controls emissions from, (vapors flashed from glycol stream route to fuel gas system for reboiler, 98% VOC and HAP control)	EQT35 FT-1 - Dehydration Unit No. 1 Flash Tank
EQT15 R-2 - Dehy Reboiler (RB-02)	Controls emissions from, (vapors flashed from glycol stream route to fuel gas system for reboiler, 98% VOC and HAP control)	EQT36 FT-2 - Dehydration Unit No. 2 Flash Tank
EQT35 FT-1 - Dehydration Unit No. 1 Flash Tank	Controls emissions from, (flashed vapors from glycol stream are diverted from the still column vent, routes to fuel system for reboiler)	EQT41 SV-1 - Dehydration Unit No. 1 Regenerator Still Vent
EQT36 FT-2 - Dehydration Unit No. 2 Flash Tank	Controls emissions from, (flashed vapors from glycol stream are diverted from the still column vent, routes to fuel system for reboiler)	EQT42 SV-2 - Dehydration Unit No. 2 Regenerator Still Vent

## INVENTORIES

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

Relationships:	Subject Item	Relationship	Subject Item
EQT46	TO-1 - Dehy Thermal Oxidizer (TO-01)	Controls emissions from, (vapors from glycol still column overheads routed to thermal oxidizer, 99% VOC and HAP control)	EQT41 SV-1 - Dehydration Unit No. 1 Regenerator Still Vent
EQT47	TO-2 - Dehy Thermal Oxidizer (TO-02)	Controls emissions from, (vapors from glycol still column overheads routed to thermal oxidizer, 99.9% VOC and HAP control)	EQT42 SV-2 - Dehydration Unit No. 2 Regenerator Still Vent

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
EQT001	DG-1 - Emergency Generator Engine (EG-035)	161	1321	.42	10	805
EQT002	GC-1A/B - Gas Compressor Engine (EG-100)	113	9457	1.33	46	703
EQT003	GC-2A/B - Gas Compressor Engine (EG-200)	113	9457	1.33	46	703
EQT004	GC-3A/B - Gas Compressor Engine (EG-300)	81	15295	2	46	838
EQT005	GC-4A/B - Gas Compressor Engine (EG-400)	81	15295	2	46	838
EQT006	GC-5A/B - Gas Compressor Engine (EG-500)	81	15295	2	21.5	838
EQT007	GC-6A/B - Gas Compressor Engine (EG-600)	81	15295	2	21.5	838
EQT008	GC-7A/B - Gas Compressor Engine (EG-700)	81	15295	2	21.5	838
EQT009	GG-1 - Emergency Generator Engine (EG-036)					
EQT010	GG-2 - Emergency Generator Engine (EG-037)					
EQT011	GG-3 - Emergency Generator Engine (EG-038)					
EQT012	GG-4 - Emergency Generator Engine (EG-039)					
EQT013	GG-5 - Emergency Generator Engine (EG-040)					
EQT014	R-1 - Dehy Reboiler (RB-01)	7	1281	2	28	800
EQT015	R-2 - Dehy Reboiler (RB-02)	21	3966	2	28	800
EQT018	MIP-2 - Methanol Injection Pump					
EQT019	MIP-3 - Methanol Injection Pump					
EQT020	MIP-4 - Methanol Injection Pump					
EQT021	MIP-5 - Methanol Injection Pump					
EQT022	T-5 - Methanol Storage Tank					
EQT023	T-7 - Oily Water Storage Tank					
EQT024	T-8A - Brine Storage Tank					
EQT025	T-8B - Brine Storage Tank					
EQT026	T-12 - Methanol/Water Mixture Storage Tank					
EQT027	F-1A - Miscellaneous Liquids Truck Loading Areas (TL1)					
EQT028	F-1B - Lubricating Oil Truck Loading Area (TL2)					
EQT029	F-1C - Methanol/Water Mixture Truck Loading Area (TL3)					
EQT034	F-1D - Pipeline Liquids Truck Loading Area (TL4)					
EQT035	FT-1 - Dehydration Unit No. 1 Flash Tank					
EQT036	FT-2 - Dehydration Unit No. 2 Flash Tank					
EQT040	PW-1 - Parts Washer					
EQT041	SV-1 - Dehydration Unit No. 1 Regenerator Still Vent					

**INVENTORIES**

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

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**Stack Information:**

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
EQT042	SV-2 - Dehydration Unit No. 2 Regenerator Still Vent	110.5				212
EQT043	T-13 - Pipeline Liquids Storage Tank					77
EQT044	T-8C - Brine Storage Tank					77
EQT045	T-8D - Brine Storage Tank					77
EQT046	TO-1 - Dehy Thermal Oxidizer (TO-01)	13	1407	1.5		
EQT047	TO-2 - Dehy Thermal Oxidizer (TO-02)	21	3966	1.5		
EQT048	V-1 - Gas Release Events		5133.3			
EQT049	GC-8 - Gas-Fired Turbine (EG-800)	3359	188947	8.46		
EOT050	GC-9 - Gas-Fired Turbine (EG-900)	3359	188947	8.46		
FUG001	F-2 - Piping Component Fugitives					77
GRP003	GC-CAP1 - Compressor Engine CAP 1 (GC-1A/B & GC-2A/B)					
GRP005	Facility - Egan Hub Partners LP - Egan Gas Storage Facility					703
GRP006	GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)					77

**Fee Information:**

Subj Item Id	Multiplier	Units Of Measure	Fee Desc
GRP005	418.2	100 hp	1450 - Recip. Nat Gas Comp (20,000 to 50,000 H.P.)

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER2004005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Subject Item	PM <sub>10</sub>		SO <sub>2</sub>		NOx		CO		VOC	
	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr
EQT 001 06-1	0.92	0.97	0.86	0.90	13.09	13.74	2.82	2.96	1.07	1.12
EQT 002 GC-1A/B	0.24		0.014		7.97		0.80			3.62
EQT 003 GC-2A/B	0.24		0.014		7.97		0.80			3.62
EQT 004 GC-3A/B	0.35		0.02		7.20		1.29			2.46
EQT 005 GC-4A/B	0.35		0.02		7.20		1.29			2.46
EQT 006 GC-5A/B	0.35		0.02		7.20		1.29			2.46
EQT 007 GC-6A/B	0.35		0.02		7.20		1.29			2.46
EQT 008 GC-7A/B	0.35		0.02		7.20		1.29			2.46
EQT 009 GG-1	0.002		< 0.001	< 0.001	0.20	0.21	0.32	0.34	0.003	0.003
EQT 010 GG-2	0.002		< 0.001	< 0.001	0.20	0.21	0.32	0.34	0.003	0.003
EQT 011 GG-3	0.002		< 0.001	< 0.001	0.20	0.21	0.32	0.34	0.003	0.003
EQT 012 GG-4	0.002		< 0.001	< 0.001	0.20	0.21	0.32	0.34	0.003	0.003
EQT 013 GG-5	0.002		< 0.001	< 0.001	0.20	0.21	0.32	0.34	0.003	0.003
EQT 014 R-1	0.02		0.001	0.001	0.20	0.21	0.17	0.18	0.10	0.11
EQT 015 R-2	0.04	0.05	0.004	0.004	0.58	0.61	0.48	0.51	0.28	0.30
EQT 018 MIP-2									0.14	0.14
EQT 019 MIP-3									0.14	0.14
EQT 020 MIP-4									0.14	0.14

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER2004005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Subject Item	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr
EQT 021									0.14	0.14
MP-5									0.10	20.05
EQT 022	T-5								0.002	0.62
EQT 023	T-7								< 0.001	0.001
EQT 024	T-8A								< 0.001	0.001
EQT 025	T-8B								0.79	22.38
EQT 026	T-12								0.08	0.12
EQT 027	F-1A								0.71	1.16
EQT 028	F-1B								9.18	14.76
EQT 029	F-1C								69.25	91.41
EQT 034	F-1D								0.09	2.25
EQT 040	PW-1								0.67	137.82
EQT 043	T-13								< 0.001	0.001
EQT 044	T-8C								< 0.001	0.001
EQT 045	T-8D								< 0.001	0.001
EQT 046	T-1	0.05	0.015	0.001	0.001	0.14	0.07	0.07	1.01	1.06
EQT 047	T-2	0.06	0.06	0.004	0.005	0.52	0.54	0.25	0.41	0.43
EQT 048	V-1	0.87	3.67	0.45	1.89	6.52	11.67	3.84	217.75	0.44
EQT 049	GC-8									1.90

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Avg lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Tons/Year	Avg lb/hr	Max lb/hr						
EQT 050 GC:9	0.87	3.67	0.45	1.89	6.52	11.67	3.84	217.75	0.44	1.90					
FUG 001 F:2															
GRP 003 GC:CAP <sup>1</sup>	0.25		0.02		8.34		0.84								
GRP 006 GC:CAP <sup>2</sup>	0.92		0.05		18.87		3.38								

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

### Permit Phase Totals:

PM<sub>10</sub>: 13.59 tons/yr

SO<sub>2</sub>: 4.52 tons/yr

NOx: 186.13 tons/yr

CO: 57.43 tons/yr

VOC: 88.13 tons/yr

### Emission rates Notes:

EQT 002	PM10	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 002	SO2	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 002	NOx	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 002	CO	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 002	VOC	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 003	PM10	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 003	SO2	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 003	NOx	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 003	CO	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 003	VOC	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 3 limits)	Which Months: All Year
EQT 004	PM10	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 004	SO2	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 004	NOx	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 004	CO	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64) Which Months: All Year	

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

EQT 004	CO	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 004	VOC	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 005	PM10	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 005	SO2	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 005	NOx	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 005	CO	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 005	CO	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 005	VOC	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 006	PM10	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 006	SO2	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 006	NOx	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 006	CO	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 006	CO	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 006	VOC	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 007	PM10	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 007	SO2	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 007	NOx	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 007	CO	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 007	CO	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 007	VOC	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 008	PM10	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 008	SO2	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 008	NOx	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 008	CO	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 008	CO	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 008	VOC	Tons/Year	(Emission rates not included in permitted totals. Compressor is permitted under GRP 6 limits)	Which Months: All Year
EQT 026	Max lb/hr	Max lb/hr	(Maximum rate occurs during loading at maximum pumping rate (150 gals/min); <= four 1 hr events annually)	Which Months: All Year
EQT 043	VOC	Max lb/hr	(Maximum rate occurs during loading at maximum pumping rate; <= five 1 hr events annually)	Which Months: All Year
EQT 046	Avg lb/hr	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 046	VOC	VOC	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 046	VOC	Tons/Year	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

All phases	VOC	Avg lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 047	VOC	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 047	VOC	Tons/Year	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 047	PM10	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 049	SO2	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 049	NOx	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 049	CO	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 049	VOC	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 050	PM10	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 050	SO2	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 050	NOx	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 050	CO	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year
EQT 050	VOC	Max lb/hr	(Maximum rate occurs during startups, 0.22 hrs/event average)	Which Months: All Year

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP -Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

All phases		1,3-Butadiene			2,2,4-Trimethylpentane			2-Methylnaphthalene			Acetaldehyde			Acrolein		
Subject Item		Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	
EQT 001	GC-1	< 0.001	< 0.001											< 0.001	< 0.001	
EQT 002	GC-1A/B	0.008	0.010			0.008	0.012			0.001	0.026			0.063		
EQT 003	GC-2A/B	0.008	0.010			0.008	0.012			0.001	0.026			0.063		
EQT 004	GC-3A/B	0.006	0.007			0.005	0.007			0.001	0.004			0.004		
EQT 005	GC-4A/B	0.006	0.007			0.005	0.007			0.001	0.004			0.004		
EQT 006	GC-5A/B	0.006	0.007			0.005	0.007			0.001	0.002			0.004		
EQT 007	GC-6A/B	0.006	0.007			0.005	0.007			0.001	0.002			0.004		
EQT 008	GC-7A/B	0.006	0.007			0.005	0.007			0.001	0.002			0.004		
EQT 009	GG-1									< 0.001	< 0.001			< 0.001	< 0.001	
EQT 010	GG-2									< 0.001	< 0.001			< 0.001	< 0.001	
EQT 011	GG-3									< 0.001	< 0.001			< 0.001	< 0.001	
EQT 012	GG-4									< 0.001	< 0.001			< 0.001	< 0.001	
EQT 013	GG-5									< 0.001	< 0.001			< 0.001	< 0.001	
EQT 014	R-1					< 0.001	< 0.001									
EQT 015	R-2					0.001	0.001									
EQT 016	MIP-2															
EQT 017	MIP-3															
EQT 020	MIP-4															

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER2004005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Subject Item	Benzene		Ethyl benzene		Formaldehyde		Methanol		Naphthalene	
	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr
EQT 001 DG-1	0.003	0.003			0.004	0.004			< 0.001	< 0.001
EQT 002 GC-1A/B	0.014				0.162					0.002
EQT 003 GC-2A/B	0.014				0.162					0.002
EQT 004 GC-3A/B	0.009				0.001					0.002
EQT 005 GC-4A/B	0.009				0.001					0.002
EQT 006 GC-5A/B	0.009				0.001					0.002
EQT 007 GC-6A/B	0.009				0.001					0.002
EQT 008 GC-7A/B	0.009				0.001					0.002
EQT 009 GG-1	< 0.001	< 0.001			0.001					0.001
EQT 010 GG-2	< 0.001	< 0.001			0.002					0.001
EQT 011 GG-3	< 0.001	< 0.001			0.002					0.001
EQT 012 GG-4	< 0.001	< 0.001			0.002					0.001
EQT 013 GG-5	< 0.001	< 0.001			0.002					0.001
EQT 014 R-1	0.002				< 0.001	< 0.001			< 0.001	< 0.001
EQT 015 R-2	0.005	0.005			< 0.001	< 0.001			0.001	0.001
EQT 018 MIP-2	0.001				< 0.001	< 0.001			0.001	0.001
EQT 019 MIP-3	0.001				< 0.001	< 0.001				
EQT 020 MIP-4	0.001									

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER2004005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Subject Item bars	Polynuclear Hydrocar		Aromatic Hydrocar		Propylene oxide		Toluene		Xylyne (mixed isomers)		n-Hexane	
	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr
EQT 001 DG-1	0.001	0.001					0.001	0.001			0.001	0.001
EQT 002 GC-1AB		0.001					0.013				0.006	
EQT 003 GC-2AB		0.001					0.013				0.006	
EQT 004 GC-3AB		0.001					0.009				0.004	
EQT 005 GC-4AB		0.001					0.009				0.004	
EQT 006 GC-5AB		0.001					0.009				0.004	
EQT 007 GC-6AB		0.001					0.009				0.004	
EQT 008 GC-7AB		0.001					0.009				0.004	
EQT 009 GC-1		0.001					0.009				0.004	
EQT 010 GC-2											0.009	
EQT 011 GC-3											0.009	
EQT 012 GC-4											0.009	
EQT 013 R-1											0.009	
EQT 014 R-2											0.009	
EQT 018 MIP-2							0.002	0.002	<	0.001	<	0.001
EQT 019 MIP-3							0.001	0.001	<	0.001	<	0.001
EQT 020 MIP-4							0.001	0.001	<	0.001	<	0.001

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Subject Item	1,3-Butadiene		2,2,4-Trimethylpentane		2-Methylnaphthalene		Acetaldehyde		Acrolein	
	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr
EQT 021 MIPS										
EQT 022 T-5										
EQT 024 T-8A										
EQT 025 T-8B										
EQT 026 T-12										
EQT 029 F-1C										
EQT 034 F-1D										
EQT 043 T-13										
EQT 044 T-8C										
EQT 045 T-8D										
EQT 046 TO-1	0.001	0.001	< 0.001	< 0.001						
EQT 047 TO-2										
EQT 048 V-1										
EQT 049 GC-8	< 0.001	< 0.001					0.001	0.004	0.001	0.002
EQT 050 GC-9	< 0.001	< 0.001					0.001	0.004	0.001	0.002
FUG 001 F-2					0.001	0.001				
GRP 003 GC-CAP <sub>1</sub>			0.008	0.008			0.001	0.027	0.066	
GRP 006 GC-CAP <sub>2</sub>	0.015	0.014	0.015	0.015	0.002	0.002	0.046	0.112	0.046	

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-000059-V1

Air - Title V Regular Permit Minor Mod

### All phases

	Benzene	Ethyl benzene	Formaldehyde	Methanol	Naphthalene
Subject Item	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr
EQT 021	0.001	0.001			
MP-5					
EQT 022					
T-5					
EQT 024	< 0.001	< 0.001			
T-8A					
EQT 025	< 0.001	< 0.001			
T-8B					
EQT 026	0.015	0.441			
T-12					
EQT 029					
F-1C					
EQT 034	0.810	1.073			
F-1D					
EQT 043	0.008	1.618			
T-13					
EQT 044	< 0.001	< 0.001			
T-8C					
EQT 045	< 0.001	< 0.001			
T-8D					
EQT 046	0.180	0.171			
T0-1					
EQT 047	0.061	0.064			
T0-2					
EQT 048	0.011	1.345	< 0.001	0.086	
V-1					
EQT 049	0.003	0.011	~ 0.007	0.029	0.015
GC-8					
EQT 050	0.003	0.011	0.007	0.029	0.015
GC-9					
FUG 001	0.008	0.021	0.001	0.001	0.798
F-2					0.957
GRP 003	0.014		0.001	0.008	0.169
GRP 006	0.024		0.002	0.014	0.289
GC-CAP2					0.004

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Subject Item	Polynuclear Aromatic Hydrocarbons		Propylene oxide		Toluene		Xylene (mixed isomers)		n-Hexane	
	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr
EQT 021 MIP-5					0.001	0.001			0.007	0.007
EQT 022 T-5										
EQT 024 T-8A			< 0.001	< 0.001			< 0.001	< 0.001	< 0.001	< 0.001
EQT 025 T-8B			< 0.001	< 0.001			< 0.001	< 0.001	< 0.001	< 0.001
EQT 026 T-12			0.005	0.136			0.001	0.019	0.078	2.294
EQT 029 F-1C										
EQT 034 F-10			0.326	0.433			0.083	0.109	1.676	2.216
EQT 043 T-13			0.003	0.653			0.001	0.164	0.029	3.341
EQT 044 T-8C			< 0.001	< 0.001			< 0.001	< 0.001	< 0.001	< 0.001
EQT 045 T-8D			< 0.001	< 0.001			< 0.001	< 0.001	< 0.001	< 0.001
EQT 046 To-1			0.126	0.132			0.073	0.069	0.017	0.018
EQT 047 To-2			0.043	0.045			0.022	0.023	0.009	0.010
EQT 048 V-1							0.003	0.430	0.152	18.375
EQT 049 GC-8	0.001	0.002	0.006	0.026			0.018	0.058		
EQT 050 GC-9	0.001	0.002	0.006	0.026			0.027	0.118	0.013	0.058
FUG 001 F-2							0.023	0.027	0.018	0.022
GRP 003 GC-CAP1		0.001					0.013		0.006	0.036
GRP 006 GC-CAP2			0.002					0.010		0.060

## EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### All phases

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

#### **Permit Parameter Totals:**

1,3-Butadiene: 0.105 tons/yr	2,2,4-Trimethylpentane: 0.104 tons/yr
2-Methyl/naphthalene: 0.010 tons/yr	
Acetaldehyde: 0.332 tons/yr	
Acrolein: 0.790 tons/yr	
Benzene: 1.453 tons/yr	
Ethyl benzene: 0.146 tons/yr	
Formaldehyde: 2.146 tons/yr	
Methanol: 8.001 tons/yr	
n-Hexane: 1.733 tons/yr	
Naphthalene: 0.037 tons/yr	
Polynuclear Aromatic Hydrocarbons: 0.015 tons/yr	
Propylene oxide: 0.054 tons/yr	
Toluene: 1.309 tons/yr	
Xylene (mixed isomers): 0.685 tons/yr	

#### **Emission Rates Notes:**

EQT 002 Formaldehyde	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 002 Formaldehyde	Tons/Year	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 003 Formaldehyde	Max lb/hr	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 003 Formaldehyde	Tons/Year	(PSEU regulated air pollutant per 40 CFR 64)	Which Months: All Year
EQT 026 Methanol	Max lb/hr	(Maximum rate occurs during loading at maximum pumping rate (150 gals/min); <= four 1 hr events annually)	Which Months: All Year
EQT 026 n-Hexane	Max lb/hr	(Maximum rate occurs during loading at maximum fill rate (100 gal/hr); <= 350 hrs annually)	Which Months: All Year
EQT 043 Benzene	Max lb/hr	(Maximum rate occurs during loading at maximum pumping rate; <= five 1 hr events annually)	Which Months: All Year
EQT 043 n-Hexane	Max lb/hr	(Maximum rate occurs during loading at maximum pumping rate; <= five 1 hr events annually)	Which Months: All Year

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### DG-1 - Emergency Generator Engine (EG-035)

- 1 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 2 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

### EQT001 GC-1A/B - Gas Compressor Engine (EG-100)

- 3 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 4 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 5 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 6 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 7 Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NOx in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 8 Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 9 Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O2 in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 10 Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NOx, CO and O2 concentrations in the stack gas obtained during annual testing. [LAC 33:III.501.C.6]
- 11 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Initial startup test to be performed on at least one of the two Waukesha engines, Emission Points GC-1A/B and GC-2A/B. [LAC 33:III.501.C.6]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### **GC-1A/B - Gas Compressor Engine (EG-100)**

#### **EQT002**

- 12 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within one of the following: +/- 0.75 of the temperature being measured expressed in C; or +/- 2.5 C. [40 CFR 64.3(b)(3)]
- 13 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 14 Temperature (surrogate for Formaldehyde) monitored by temperature monitoring device daily Catalyst inlet and outlet temperature measured using a thermocouple while in operation. (1) Data Representativeness: Thermocouples will be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouples will remain until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: Initial performance test; and (3) Frequency of monitoring: Monitor and record the catalyst inlet and outlet temperature once per day. [40 CFR 64.6(c)(1)]
- 15 Which Months: All Year Statistical Basis: None specified  
Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 16 An excursion or exceedance is defined as an actual temperature measurement below the minimum temperature range across the inlet and outlet of the catalyst bed. Minimum temperature range across the inlet and outlet of the catalyst bed shall be established using the most appropriate of the following: the most recent performance, manufacturer's recommendations, engineering calculations, and/or historical data. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]
- 17 Schedule for installation, testing or final verification of operational status: After installation of the catalytic oxidation control devices, an initial performance test will be conducted within sixty days after achieving normal production rate but in no event later than 180 days after initial start-up. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]
- 18 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 19 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 20 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 21 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### **GC-1A/B - Gas Compressor Engine (EG-100)**

- 22 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the formaldehyde emission limitation or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 23 Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(ii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 24 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 25 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 26 Monitoring data recordkeeping by electronic or hard copy daily. Monitor and record the catalyst inlet and outlet temperature once per day. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### **GC-2A/B - Gas Compressor Engine (EG-200)**

- 27 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 28 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.151.3]
- 29 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 30 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 31 Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NOx in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 32 Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 33 Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O2 in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 34 Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NOx, CO and O2 concentrations in the stack gas obtained during annual testing. [LAC 33:III.501.C.6]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-0059-V1

Air - Title V Regular Permit Minor Mod

### EQT003 GC-2A/B - Gas Compressor Engine (EG-200)

- 35 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:II.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Initial startup test to be performed on at least one of the two Waukesha engines. Emission Points GC-1A/B and GC-2A/B. [LAC 33:III.501.C.6]
- 36 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within one of the following: +/- 0.75 of the temperature being measured expressed in C; or +/- 2.5 C. [40 CFR 64.3(b)(3)]
- 37 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 38 Temperature (surrogate for Formaldehyde) monitored by temperature monitoring device daily Catalyst inlet and outlet temperature measured using a thermocouple while in operation. (1) Data Representativeness: Thermocouples will be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouples will remain until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: Initial performance test; and (3) Frequency of monitoring: Monitor and record the catalyst inlet and outlet temperature once per day. [40 CFR 64.6(c)(1)]
- 39 Which Months: All Year Statistical Basis: None specified
- 39 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 40 An excursion or exceedance is defined as an actual temperature measurement below the minimum temperature range across the inlet and outlet of the catalyst bed. Minimum temperature range across the inlet and outlet of the catalyst bed shall be established using the most appropriate of the following: the most recent performance, manufacturer's recommendations, engineering calculations, and/or historical data. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]
- 41 Schedule for installation, testing or final verification of operational status: After installation of the catalytic oxidation control devices, an initial performance test will be conducted within sixty days after achieving normal production rate but in no event later than 180 days after initial start-up. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]
- 42 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 43 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 44 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### EQT003      GC-2A/B - Gas Compressor Engine (EG-200)

- 45 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 46 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the formaldehyde emission limitation or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 47 Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 48 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 49 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 50 Monitoring data recordkeeping by electronic or hard copy daily. Monitor and record the catalyst inlet and outlet temperature once per day. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### EQT004      GC-3A/B - Gas Compressor Engine (EG-300)

- 51 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year    Statistical Basis: Six-minute average
- 52 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 53 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 54 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 55 Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NO<sub>x</sub> in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year    Statistical Basis: None specified
- 56 Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year    Statistical Basis: None specified

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-000059-V1

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### EQT004 GC-3A/B - Gas Compressor Engine (EG-300)

- 57 Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O<sub>2</sub> in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 58 Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NO<sub>x</sub>, CO and O<sub>2</sub> concentrations in the stack gas obtained during annual testing. [LAC 33:III.501.C.6]
- 59 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Initial startup test to be performed on at least three of the five Caterpillar engines, Emission Points GC-3.A/B through GC-7.A/B. [LAC 33:III.501.C.6]
- 60 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within one of the following: +/- 0.75 of the temperature being measured expressed in C; or +/- 2.5 C. [40 CFR 64.3(b)(3)]
- 61 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 62 Temperature (surrogate for Carbon monoxide) monitored by temperature monitoring device daily Catalyst inlet and outlet temperature measured using a thermocouple while in operation. (1) Data Representativeness: Thermocouples will be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouples will remain until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: Initial performance test, and (3) Frequency of monitoring: Monitor and record the catalyst inlet and outlet temperature once per day. [40 CFR 64.6(c)(1)]
- Which Months: All Year Statistical Basis: None specified
- 63 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 64 An excursion or exceedance is defined as an actual temperature measurement below the minimum temperature range across the inlet and outlet of the catalyst bed. Minimum temperature range across the inlet and outlet of the catalyst bed shall be established using the most appropriate of the following: the most recent performance, manufacturer's recommendations, engineering calculations, and/or historical data. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]
- 65 Schedule for installation, testing or final verification of operational status: After installation of the catalytic oxidation control devices, an initial performance test will be conducted within sixty days after achieving normal production rate, but in no event later than 180 days after initial start-up. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]
- 66 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 67 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### EQT004      GC-3A/B - Gas Compressor Engine (EG-300)

68 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]

69 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

70 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the carbon monoxide emission limitation or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]

71 Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]

72 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]

73 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

74 Monitoring data recordkeeping by electronic or hard copy daily. Monitor and record the catalyst inlet and outlet temperature once per day. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### EQT005      GC-4A/B - Gas Compressor Engine (EG-400)

75 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year   Statistical Basis: Six-minute average

76 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

77 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]  
78 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]

79 Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NOX in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]  
Which Months: All Year   Statistical Basis: None specified

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### EQT005      GC-4A/B - Gas Compressor Engine (EG-400)

- 80 Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year   Statistical Basis: None specified
- 81 Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O<sub>2</sub> in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year   Statistical Basis: None specified
- 82 Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NO<sub>x</sub>, CO and O<sub>2</sub> concentrations in the stack gas obtained during annual testing. [LAC 33:III.501.C.6]
- 83 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Initial startup test to be performed on at least three of the five Caterpillar engines, Emission Points GC-3/A/B through GC-7/A/B. [LAC 33:III.501.C.6]
- 84 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within one of the following: +/- 0.75 of the temperature being measured expressed in C; or +/- 2.5 C. [40 CFR 64.3(b)(3)]
- 85 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 86 Temperature (surrogate for Carbon monoxide) monitored by temperature monitoring device daily Catalyst inlet and outlet temperature measured using a thermocouple while in operation. (1) Data Representativeness: Thermocouples will be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouples will remain until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: Initial performance test; and (3) Frequency of monitoring: Monitor and record the catalyst inlet and outlet temperature once per day. [40 CFR 64.6(c)(1)]
- Which Months: All Year   Statistical Basis: None specified
- 87 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 88 An excursion or exceedance is defined as an actual temperature measurement below the minimum temperature range across the inlet and outlet of the catalyst bed. Minimum temperature range across the inlet and outlet of the catalyst bed shall be established using the most appropriate of the following: the most recent performance, manufacturer's recommendations, engineering calculations, and/or historical data. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]
- 89 Schedule for installation, testing or final verification of operational status: After installation of the catalytic oxidation control devices, an initial performance test will be conducted within sixty days after achieving normal production rate but in no event later than 180 days after initial start-up. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### **GC-4A/B - Gas Compressor Engine (EG-400)**

#### **EQT005**

- 90 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 91 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 92 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 93 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 94 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the carbon monoxide emission limitation or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 95 Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit proposed monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 96 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 97 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 98 Monitoring data recordkeeping by electronic or hard copy daily. Monitor and record the catalyst inlet and outlet temperature once per day. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### **GC-5A/B - Gas Compressor Engine (EG-500)**

#### **EQT006**

- 99 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 100 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 101 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility  
Activity Number: PER20040005  
Permit Number: 0040-00059-V1  
Air - Title V Regular Permit Minor Mod

### GC-5A/B - Gas Compressor Engine (EG-500)

- 102 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 103 Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NOx in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 104 Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 105 Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O2 in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 106 Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NOx, CO and O2 concentrations in the stack gas obtained during annual testing. [LAC 33:III.501.C.6]
- 107 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Initial startup test to be performed on at least three of the five Caterpillar engines, Emission Points GC-3/A/B through GC-7/A/B. [LAC 33:III.501.C.6]
- 108 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within one of the following: +/- 0.75 of the temperature being measured expressed in C; or +/- 2.5 C. [40 CFR 64.3(b)(3)]
- 109 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 110 Temperature (surrogate for Carbon monoxide) monitored by temperature monitoring device daily Catalyst inlet and outlet temperature measured using a thermocouple while in operation. (1) Data Representativeness: Thermocouples will be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouples will remain until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: Initial performance test, and (3) Frequency of monitoring: Monitor and record the catalyst inlet and outlet temperature once per day. [40 CFR 64.6(c)(1)]
- Which Months: All Year Statistical Basis: None specified
- 111 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 112 An excursion or exceedance is defined as an actual temperature measurement below the minimum temperature range across the inlet and outlet of the catalyst bed. Minimum temperature range across the inlet and outlet of the catalyst bed shall be established using the most appropriate of the following: the most recent performance, manufacturer's recommendations, engineering calculations, and/or historical data. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

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### EQT006      GC-5A/B - Gas Compressor Engine (EG-500)

- 113 Schedule for installation, testing or final verification of operational status: After installation of the catalytic oxidation control devices, an initial performance test will be conducted within sixty days after achieving normal production rate but in no event later than 180 days after initial start-up. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]
- 114 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 115 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

- 116 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 117 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

- 118 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the carbon monoxide emission limitation or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]

- 119 Submit report: Due on and after the date specified in 40 CFR 70.6(a)(3)(ii), include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 120 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 121 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 122 Monitoring data recordkeeping by electronic or hard copy daily. Monitor and record the catalyst inlet and outlet temperature once per day. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### EQT007      GC-6A/B - Gas Compressor Engine (EG-600)

- 123 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33.III.1311.C, LAC 33.III.1101.B]  
Which Months: All Year   Statistical Basis: Six-minute average

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP • Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### **GC-6A/B - Gas Compressor Engine (EG-600)**

- EQT007**
- 124 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III 1513]
- 125 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III 501.C.6]
- 126 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III 501.C.6]
- 127 Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NOx in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III 501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 128 Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III 501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 129 Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III 501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 130 Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NOx, CO and O2 concentrations in the stack gas obtained during annual testing. [LAC 33:III 501.C.6]
- 131 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III 913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Initial startup test to be performed on at least three of the five Caterpillar engines, Emission Points GC-3/A/B through GC-7A/B. [LAC 33:III 501.C.6]
- 132 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within one of the following: +/- 0.75 of the temperature being measured expressed in C, or +/- 2.5 C. [40 CFR 64.3(b)(3)]
- 133 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 134 Temperature (surrogate for Carbon monoxide) monitored by temperature monitoring device daily Catalyst inlet and outlet temperature measured using a thermocouple while in operation. (1) Data Representativeness: Thermocouples will be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouples will remain until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: Initial performance test; and (3) Frequency of monitoring: Monitor and record the catalyst inlet and outlet temperature once per day. [40 CFR 64.6(c)(1)]
- Which Months: All Year Statistical Basis: None specified

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

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### **GC-6A/B - Gas Compressor Engine (EG-600)**

**EQT007**

- 135 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 136 An excursion or exceedance is defined as an actual temperature measurement below the minimum temperature range across the inlet and outlet of the catalyst bed. Minimum temperature range across the inlet and outlet of the catalyst bed shall be established using the most appropriate of the following: the most recent performance, manufacturer's recommendations, engineering calculations, and/or historical data. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]
- 137 Schedule for installation, testing or final verification of operational status: After installation of the catalytic oxidation control devices, an initial performance test will be conducted within sixty days after achieving normal production rate but in no event later than 180 days after initial start-up. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]
- 138 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 139 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 140 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 141 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 142 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the carbon monoxide emission limitation or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 143 Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 144 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 145 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 146 Monitoring data recordkeeping by electronic or hard copy daily. Monitor and record the catalyst inlet and outlet temperature once per day. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

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### **EQT008      GC-7A/B - Gas Compressor Engine (EG-700)**

- 147 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.13.II.C, LAC 33:III.1.I01.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 148 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.15.13]
- 149 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.50].C.6]
- 150 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 151 Stack gas concentration: Nitrogen oxides monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of NO<sub>x</sub> in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 152 Stack gas concentration: Carbon monoxide monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 153 Stack gas concentration: Oxygen monitored by portable analyzer annually (twelve months after the stack test or previous annual test, plus or minus 30 days). Maintain concentrations of O<sub>2</sub> in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 154 Equipment/operational data recordkeeping by electronic or hard copy annually. Recorded parameters are NO<sub>x</sub>, CO and O<sub>2</sub> concentrations in the stack gas obtained during annual testing. [LAC 33:III.501.C.6]
- 155 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.91.3, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. Initial startup test to be performed on at least three of the five Caterpillar engines, Emission Points GC-3 A/B through GC-7A/B. [LAC 33:III.501.C.6]
- 156 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within one of the following: +/- 0.75 of the temperature being measured expressed in C; or +/- 2.5 C. [40 CFR 64.3(b)(3)]
- 157 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]

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### **EQT008    GC-7A/B - Gas Compressor Engine (EG-700)**

- 158 Temperature (surrogate for Carbon monoxide) monitored by temperature monitoring device daily Catalyst inlet and outlet temperature measured using a thermocouple while in operation. (1) Data Representativeness: Thermocouples will be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouples will remain until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: Initial performance test; and (3) Frequency of monitoring: Monitor and record the catalyst inlet and outlet temperature once per day. [40 CFR 64.6(c)(1)]  
Which Months: All Year Statistical Basis: None specified
- 159 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 160 An excursion or exceedance is defined as an actual temperature measurement below the minimum temperature range across the inlet and outlet of the catalyst bed. Minimum temperature range across the inlet and outlet of the catalyst bed shall be established using the most appropriate of the following: the most recent performance, manufacturer's recommendations, engineering calculations, and/or historical data. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]
- 161 Schedule for installation, testing or final verification of operational status: After installation of the catalytic oxidation control devices, an initial performance test will be conducted within sixty days after achieving normal production rate but in no event later than 180 days after initial start-up. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]
- 162 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 163 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 164 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 165 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 166 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the carbon monoxide emission limitation or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 167 Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 168 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]

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### EQT008      GC-7AB - Gas Compressor Engine (EG-700)

- 169 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 170 Monitoring data recordkeeping by electronic or hard copy daily. Monitor and record the catalyst inlet and outlet temperature once per day. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### EQT009      GG-1- Emergency Generator Engine (EG-036)

- 171 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 172 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

### EQT010      GG-2 - Emergency Generator Engine (EG-037)

- 173 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 174 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

### EQT011      GG-3 - Emergency Generator Engine (EG-038)

- 175 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 176 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

### EQT012      GG-4 - Emergency Generator Engine (EG-039)

- 177 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: Six-minute average
- 178 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

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### **GG-5 - Emergency Generator Engine (EG-040)**

179 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.110.B]

Which Months: All Year Statistical Basis: Six-minute average

180 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

### **R-1- Dehy Reb boiler (RB-01)**

181 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.110.B]

Which Months: All Year Statistical Basis: None specified

182 Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). [LAC 33:III.1313.C]

Which Months: All Year Statistical Basis: None specified

183 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

184 Glycol Dehydration Unit Process Vents exempt from control requirements under paragraph 63.1274(d): Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in 40 CFR 63.1284(d)(2) of this section, for each glycol dehydration unit that is not controlled according to the requirements of paragraph 63.1274(c). Subpart HHH. [40 CFR 63.1284(d)]

### **R-2 - Dehy Reb boiler (RB-02)**

185 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1313.C]

Which Months: All Year Statistical Basis: None specified

186 Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). [LAC 33:III.110.B]

Which Months: All Year Statistical Basis: None specified

187 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

188 Glycol Dehydration Unit Process Vents exempt from control requirements under paragraph 63.1274(d): Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in 40 CFR 63.1284(d)(2) of this section, for each glycol dehydration unit that is not controlled according to the requirements of paragraph 63.1274(c). Subpart HHH. [40 CFR 63.1284(d)]

### **T-5 - Methanol Storage Tank**

189 Equip with a submerged fill pipe. [LAC 33:III.2103.A]

190 Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e. [LAC 33:III.2103.H.3]

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### EQT022 T-5 - Methanol Storage Tank

- 191 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. [LAC 33:III.2103.1]

### EQT026 T-12 - Methanol/Water Mixture Storage Tank

- 192 Equip with a submerged fill pipe. [LAC 33:III.2103.A]  
193 Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a.e. [LAC 33:III.2103.H.3]  
194 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. [LAC 33:III.2103.1]

### EQT035 FT-1 - Dehydration Unit No. 1 Flash Tank

- 195 Flash Tank Off Gas: VOC, Total >= 98 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

- 196 Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of the results of any testing conducted in accordance with LAC 33:III.2116.D. [LAC 33:III.501.C.6]  
197 Determine actual average benzene emissions using the model GRI-GLYCalc, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc Technical Reference Manual. Subpart HHH. [40 CFR 63.1282(a)(2)(i)]

- 198 Determine an average mass rate of benzene emissions in kilograms per hour through direct measurement by performing three runs of Method 18 in 40 CFR part 60, appendix A (or an equivalent method), and averaging the results of the three runs. Determine annual emissions in kilograms per year by multiplying the mass rate by the number of hours the unit is operated per year. Convert this result to megagrams per year. Subpart HHH. [40 CFR 63.1282(a)(2)(ii)]  
199 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 40 CFR 63.1284(d)(1) or (d)(2), as appropriate, for each glycol dehydration unit that is not controlled according to the requirements of 40 CFR 63.1274(c). Subpart HHH. [40 CFR 63.1284(d)]

### EQT036 FT-2 - Dehydration Unit No. 2 Flash Tank

- 200 Flash Tank Off Gas: VOC, Total >= 98 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

- 201 Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of the results of any testing conducted in accordance with LAC 33:III.2116.D. [LAC 33:III.501.C.6]  
202 Determine actual average benzene emissions using the model GRI-GLYCalc, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc Technical Reference Manual. Subpart HHH. [40 CFR 63.1282(a)(2)(i)]

- 203 Determine an average mass rate of benzene emissions in kilograms per hour through direct measurement by performing three runs of Method 18 in 40 CFR part 60, appendix A (or an equivalent method), and averaging the results of the three runs. Determine annual emissions in kilograms per year. Subpart HHH. [40 CFR 63.1282(a)(2)(ii)]  
204 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 40 CFR 63.1284(d)(1) or (d)(2), as appropriate, for each glycol dehydration unit that is not controlled according to the requirements of 40 CFR 63.1274(c). Subpart HHH. [40 CFR 63.1284(d)]

### EQT041 SV-1 - Dehydration Unit No. 1 Regenerator Still Vent

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### EQT041 SV-1 - Dehydration Unit No. 1 Regenerator Still Vent

- 205 VOC/HAP Control: Temperature  $\geq$  1700 F (927 degrees C) for 0.5 seconds or greater in a thermal incinerator. Device will provide 99 percent or greater VOC/HAP destruction or removal efficiency, as determined in accordance with LAC 33:III.2115.J.1. [LAC 33:III.2115.G, 40 CFR 64]
- Which Months: All Year Statistical Basis: None specified
- 206 Demonstrate compliance with LAC 33:III.2115.A through G by applying the test methods specified in LAC 33:III.2115.I.1 through 5, as appropriate. [LAC 33:III.2115.I.]
- 207 Demonstrate compliance with LAC 33:III.2115 as requested by DEQ. [LAC 33:III.2115.J.1]
- 208 Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e. [LAC 33:III.2115.J.2]
- 209 Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2115 as a result of a revision of LAC 33:III.2115. [LAC 33:III.2115.J]
- 210 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request. [LAC 33:III.2115.K]
- 211 Still Column Overheads: VOC, Total  $\geq$  99 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2115. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 212 Determine actual average benzene emissions using the model GRI-GLYCalc, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc Technical Reference Manual. Subpart HHH. [40 CFR 63.1282(a)(2)(i)]
- 213 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 40 CFR 63.1284(d)(1) or (d)(2), as appropriate, for each glycol dehydration unit that is not controlled according to the requirements of 40 CFR 63.1274(c). Subpart HHH. [40 CFR 63.1284(d)]

### EQT042 SV-2 - Dehydration Unit No. 2 Regenerator Still Vent

- 214 VOC/HAP Control: Temperature  $\geq$  1500 F (816 degrees C) for 0.5 seconds or greater in a thermal incinerator. Device will provide 99.9 percent or greater VOC/HAP destruction or removal efficiency, as determined in accordance with LAC 33:III.2115.J.1. [LAC 33:III.2115.G, 40 CFR 64]
- Which Months: All Year Statistical Basis: None specified
- 215 Demonstrate compliance with LAC 33:III.2115.A through G by applying the test methods specified in LAC 33:III.2115.I.1 through 5, as appropriate. [LAC 33:III.2115.I.]
- 216 Demonstrate compliance with LAC 33:III.2115 as requested by DEQ. [LAC 33:III.2115.J.]
- 217 Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e. [LAC 33:III.2115.J.2]
- 218 Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2115 as a result of a revision of LAC 33:III.2115. [LAC 33:III.2115.J]
- 219 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request. [LAC 33:III.2115.K]
- 220 Still Column Overheads: VOC, Total  $\geq$  99.9 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2115. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 221 Determine actual average benzene emissions using the model GRI-GLYCalc, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc Technical Reference Manual. Subpart HHH. [40 CFR 63.1282(a)(2)(i)]

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### EQT042 SV-2 - Dehydration Unit No. 2 Regenerator Still Vent

- 222 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 40 CFR 63.1284(d)(1) or (d)(2), as appropriate, for each glycol dehydration unit that is not controlled according to the requirements of 40 CFR 63.1274(c). Subpart HH. [40 CFR 63.1284(d)]

### EQT043 T-13 - Pipeline Liquids Storage Tank

- 223 Equip with a submerged fill pipe. [LAC 33:III.2103.A]
- 224 Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a.e. [LAC 33:III.2103.H.3]
- 225 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. [LAC 33:III.2103.I.]

### EQT046 TO-1 - Deny Thermal Oxidizer (TO-01)

- 226 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
- Which Months: All Year Statistical Basis: None specified
- 227 Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). [LAC 33:III.1313.C]
- Which Months: All Year Statistical Basis: None specified
- 228 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 1.5. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 229 Still Column Overheads: VOC, Total >= 99 % reduction and >= 99 % reduction in HAPs. Demonstrate percent reduction using the methods found in LAC 33:III.2115. [LAC 33:III.2115.G, 40 CFR 64]
- Which Months: All Year Statistical Basis: None specified
- 230 VOC/HAP Control: Temperature > 1700 F (927 degrees C) for 0.5 seconds or greater in the combustion chamber of the thermal oxidizer. Device will provide 99 percent or greater VOC/HAP destruction or removal efficiency, as determined in accordance with LAC 33:III.2115.J.1. [LAC 33:III.2115.G, 40 CFR 64]
- Which Months: All Year Statistical Basis: None specified
- 231 Determine compliance with LAC 33:III.2115.A through G by applying the test methods specified in LAC 33:III.2115.I.1 through 5, as appropriate. [LAC 33:III.2115.I]
- 232 Demonstrate compliance with LAC 33:III.2115 as requested by DEQ. [LAC 33:III.2115.J.1]
- 233 Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e. [LAC 33:III.2115.J.2]
- 234 Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2115 as a result of a revision of LAC 33:III.2115.J
- 235 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request. [LAC 33:III.2115.K]
- 236 VOHAP <= 4.40 tons/yr (PSEU regulated air pollutant per 40 CFR 64). [LAC 33:III.501.C.6, 40 CFR 64]
- Which Months: All Year Statistical Basis: Annual maximum
- 237 VOHAP <= 1.005 lb/hr (PSEU regulated air pollutant per 40 CFR 64). [LAC 33:III.501.C.6, 40 CFR 64]
- Which Months: All Year Statistical Basis: Hourly average

## SPECIFIC REQUIREMENTS

AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

Permit Number: 0040-00059-V1

Air - Title V Regular Permit Minor Mod

### EQT046 TO-1 - Dehy Thermal Oxidizer (TO-01)

238 VOHAP <= 1,005 lb/hr (PSEU regulated air pollutant per 40 CFR 64). [LAC 33:III.501.C.6, 40 CFR 64]

Which Months: All Year Statistical Basis: Hourly maximum

239 Glycol Dehydration Unit Process Vents exempt from control requirements under paragraph 63.1274(d): Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in 40 CFR 63.1284(d)(2) of this section, for each glycol dehydration unit that is not controlled according to the requirements of paragraph 63.1274(c). Subpart HHH. [40 CFR 63.1284(d)]

240 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within 12.8 F for TO-1 and within 11.3 F for TO-2 (+ 0.75 % of the temperature being measured). [40 CFR 64.3(b)(3)]

241 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]

242 VOC/HAPs Control: Temperature monitored by temperature monitoring device daily. Combustion chamber temperature is to be monitored with a thermocouple. (1) Data Representativeness: Thermocouples would be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouple would be left alone until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: existing; and (3) Frequency of monitoring: Monitor and record the combustion chamber temperature once per day. [40 CFR 64.6(c)(1)]

243 Which Months: All Year Statistical Basis: None specified

243 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]

244 An excursion or exceedance is defined as an actual measured combustion chamber temperature below the minimum value listed in this permit. The minimum value for combustion chamber temperature is the temperature established by the manufacturer to achieve the destruction efficiency guaranteed. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]

245 Equipment/operational data recordkeeping by electronic or hard copy continuously. [40 CFR 64.6(c)(4)]

246 Schedule for installation, testing or final verification of operational status: An initial performance test will be conducted after achieving normal production rate of glycol dehydration unit. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]

247 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]

248 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

249 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]

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AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

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Air - Title V Regular Permit Minor Mod

### EQT046 TO-1 - Dehy Thermal Oxidizer (TO-01)

250 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

251 Submit written notification. Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the VOC/HAPs emission limitations or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]

252 Submit report. Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]

253 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]

254 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

255 VOC/HAPs Control: Monitoring data recordkeeping by electronic or hard copy continuously. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### EQT047 TO-2 - Dehy Thermal Oxidizer (TO-02)

256 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]

Which Months: All Year Statistical Basis: None specified

257 Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). [LAC 33:III.1313.C]

Which Months: All Year Statistical Basis: None specified

258 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

259 VOC/HAP Control: Temperature > 1500 F (816 degrees C) for 0.5 seconds or greater in the combustion chamber of the thermal oxidizer. Device will provide 99.9 percent or greater VOC/HAP destruction or removal efficiency, as determined in accordance with LAC 33:III.2115.J.1. [LAC 33:III.2115.G, 40 CFR 64]

Which Months: All Year Statistical Basis: None specified

260 Still Column Overheads: VOC, Total >= 99.9 % reduction and >= 99 % reduction in HAPs. Demonstrate percent reduction using the methods found in LAC 33:III.2115. [40 CFR 64, LAC 33:III.2115.G]

Which Months: All Year Statistical Basis: None specified

261 Determine compliance with LAC 33:III.2115.A through G by applying the test methods specified in LAC 33:III.2115.I.1 through 5, as appropriate. [LAC 33:III.2115.I.]

262 Demonstrate compliance with LAC 33:III.2115 as requested by DEQ. [LAC 33:III.2115.J.1]

263 Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e. [LAC 33:III.2115.J.2]

## SPECIFIC REQUIREMENTS

**AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility**

**Activity Number: PER20040005**

**Permit Number: 0040-00059-V1**

**Air - Title V Regular Permit Minor Mod**

### EQT047 TO-2 - Dehy Thermal Oxidizer (TO-02)

- 264 Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2115 as a result of a revision of LAC 33:III.2115. [LAC 33:III.2115.J]
- 265 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K. I through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request. [LAC 33:III.2115.K]
- 266 VOHAP <= 0.345 lb/hr (PSEU regulated air pollutant per 40 CFR 64). [40 CFR 64, LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Hourly maximum
- 267 VOHAP <= 0.345 lb/hr (PSEU regulated air pollutant per 40 CFR 64). [LAC 33:III.501.C.6, 40 CFR 64]
- Which Months: All Year Statistical Basis: Hourly average
- 268 VOHAP <= 1.51 tons/yr (PSEU regulated air pollutant per 40 CFR 64). [40 CFR 64, LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: Annual maximum
- 269 Glycol Dehydration Unit Process Vents exempt from control requirements under paragraph 63.1274(d): Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in 40 CFR 63.1284(d)(2) of this section, for each glycol dehydration unit that is not controlled according to the requirements of paragraph 63.1274(c). Subpart HHH. [40 CFR 63.1284(d)]
- 270 Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specification, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate within 12.8 F for TO-1 and within 11.3 F for TO-2 (+ 0.75 % of the temperature being measured). [40 CFR 64.3(b)(3)]
- 271 Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 272 VOC/HAPs Control: Temperature monitored by temperature monitoring device daily. Combustion chamber temperature is to be monitored with a thermocouple. (1) Data Representativeness: Thermocouples would be purchased with a calibration check at various points throughout the range of operation of the thermocouple. Once installed, the thermocouple would be left alone until replacement is necessary following thermocouple failure denoted by maximum temperature reading; (2) Verification of Operational Status: existing; and (3) Frequency of monitoring: Monitor and record the combustion chamber temperature once per day. [40 CFR 64.6(c)(1)]
- 273 Which Months: All Year Statistical Basis: None specified
- 273 Submit Notification: Due at the DEQ upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 274 An excursion or exceedance is defined as an actual measured combustion chamber temperature below the minimum value listed in this permit. The minimum value for combustion chamber temperature is the temperature established by the manufacturer to achieve the destruction efficiency guaranteed. An excursion is also any missed daily temperature reading that is not due to weather conditions. Excursions trigger an inspection, corrective action, and documentation. [40 CFR 64.6(c)(2)]
- 275 Equipment/operational data recordkeeping by electronic or hard copy continuously. [40 CFR 64.6(c)(4)]
- 276 Schedule for installation, testing or final verification of operational status: An initial performance test will be conducted after achieving normal production rate of glycol dehydration unit. The Office of Environmental Assessment, Environmental Technology Division shall be notified at least 30 days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. [40 CFR 64.6(d)]
- 277 Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]

## SPECIFIC REQUIREMENTS

**AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility**

**Activity Number: PER20040005**

**Permit Number: 0040-00059-V1**

**Air - Title V Regular Permit Minor Mod**

### EQT047 TO-2 - Deny Thermal Oxidizer (TO-02)

- 278 Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 279 Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 280 Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 281 Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the VOC/HAPs emission limitations or the standard for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 282 Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(ii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(K) through (a)(2)(K)(iii), as applicable. [40 CFR 64.9(a)]
- 283 Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 284 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 285 VOC/HAPs Control: Monitoring data recordkeeping by electronic or hard copy continuously. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

### EQT048 V-1 - Gas Release Events

- 286 Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request. [LAC 33:III.2115.K]

### EQT049 GC-8 - Gas-Fired Turbine (EG-800)

- 287 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: None specified
- 288 Opacity <= 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]  
Which Months: All Year Statistical Basis: Six-minute average

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### EQT049 GC-8 - Gas-Fired Turbine (EG-800)

- 289 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 290 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 291 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 292 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources or Method 20 - Determination of Nitrogen Oxides, Sulfur Dioxide and Oxygen emissions from Stationary Gas Turbines, and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.9.13, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]
- 293 Nitrogen oxides <= 0.015 % by volume at 15% oxygen and on a dry basis in gases discharged to the atmosphere. Use analytical methods and procedures that are accurate to within 5 percent and are approved by DEQ to determine the nitrogen content of the fuel being fired per 40 CFR 60.335(a). Subpart GG. [40 CFR 60.332(a)(2)]
- Which Months: All Year Statistical Basis: None specified
- 294 Fuel sulfur content <= 0.8 % by weight (8000 ppmw) for any fuel burned. Subpart GG. [40 CFR 60.333(b)]
- Which Months: All Year Statistical Basis: None specified
- 295 Nitrogen oxides: Permittee who elects not to install a CEMS under paragraph 60.334(e) of this section on a new turbine, may instead perform continuous parameter monitoring under paragraph 60.334(f)(2). For any lean premix stationary combustion turbine, permittee shall continuously monitor the appropriate parameters to determine whether the unit is operating in the lean premixed (low-NOX) combustion mode. [40 CFR 60.334(f)(2)]
- 296 Monitor the steam or water to fuel ratio or other parameters that are continuously monitored as described in 40 CFR 60.334(a), (d) or (f) during the performance test required under 40 CFR 60.8, to establish acceptable values and ranges. Develop and keep on-site a parameter monitoring plan which explains the procedures used to document proper operation of the NOx emission controls. Include the parameter(s) monitored and the acceptable range(s) of the parameter(s) as well as the basis for designating the parameter(s) and acceptable range(s). Include any supplemental data such as engineering analyses, design specifications, manufacturer's recommendations and other relevant information in the monitoring plan. Subpart GG. [40 CFR 60.334(g)]
- 297 Fuel sulfur content monitored by the regulation's specified method(s) at the regulation's specified frequency, except as specified in 40 CFR 60.334(h)(3). Monitor the total sulfur content of the fuel being fired in the turbine using total sulfur methods described in 40 CFR 60.335(b)(10). Subpart GG. [40 CFR 60.334(h)(1)]
- Which Months: All Year Statistical Basis: None specified
- 298 Fuel nitrogen content monitored by the regulation's specified method(s) at the regulation's specified frequency. Monitor the nitrogen content of the fuel combusted in the turbine, if claiming an allowance for fuel bound nitrogen. Determine the nitrogen content of the fuel using methods described in 40 CFR 60.335(b)(9) or an approved alternative. Subpart GG. [40 CFR 60.334(h)(2)]
- Which Months: All Year Statistical Basis: None specified
- 299 Fuel sulfur content: Notwithstanding the provisions of paragraph 60.334(h)(1) of this section, permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in paragraph 60.331(u), regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. Permittee shall use one of the following sources of information to make the required demonstration: (3)(i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less. [40 CFR 60.334(h)(3)(i)]

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AI ID: 24083 - Egan Hub Partners LP - Egan Gas Storage Facility

Activity Number: PER20040005

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### EQT049 GC-8 - Gas-Fired Turbine (EG-800)

- 300 Submit excess emissions reports and monitor downtime in accordance with 40 CFR 60.7(c). Report excess emissions for all periods of unit operation, including startup, shutdown and malfunction. Subpart GG. [40 CFR 60.334(j)]
- 301 Determine compliance using the test methods and procedures specified in 40 CFR 60.335(a) through (c). Subpart GG. [40 CFR 60.335]
- 302 Comply with all applicable requirements of 40 CFR 60, Subpart KKKK, upon promulgation. NSPS KKKK. [40 CFR 60.4305]

### EQT050 GC-9 - Gas-Fired Turbine (EG-900)

- 303 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: None specified
- 304 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]  
Which Months: All Year Statistical Basis: Six-minute average
- 305 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 306 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 307 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 308 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shakedown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources or Method 20 - Determination of Nitrogen Oxides, Sulfur Dioxide and Oxygen emissions from Stationary Gas Turbines, and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]
- 309 Fuel sulfur content <= 0.8 % by weight (8000 ppmw) for any fuel burned. Subpart GG. [40 CFR 60.333(b)]  
Which Months: All Year Statistical Basis: None specified
- 310 Nitrogen oxides: Permittee who elects not to install a CEMS under paragraph 60.334(e) of this section on a new turbine, may instead perform continuous parameter monitoring under paragraph 60.334(f)(2). For any lean premix stationary combustion turbine, permittee shall continuously monitor the appropriate parameters to determine whether the unit is operating in the lean premixed (low-NOX) combustion mode. [40 CFR 60.334(f)(2)]
- 311 Monitor the steam or water to fuel ratio or other parameters that are continuously monitored as described in 40 CFR 60.334(a), (d) or (f) during the performance test required under 40 CFR 60.8, to establish acceptable values and ranges. Develop and keep on-site a parameter monitoring plan which explains the procedures used to document proper operation of the NOx emission controls. Include the parameter(s) monitored and the acceptable range(s) of the parameter(s) as well as the basis for designating the parameter(s) and acceptable range(s). Include any supplemental data such as engineering analyses, design specifications, manufacturer's recommendations and other relevant information in the monitoring plan. Subpart GG. [40 CFR 60.334(g)]

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### EQT050      GC-9 - Gas-Fired Turbine (EG-900)

312 Sulfur: Notwithstanding the provisions of paragraph 60.334(h)(1) of this section, permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in paragraph 60.331(u), regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. Permittee shall use one of the following sources of information to make the required demonstration: (3)(i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less. [40 CFR 60.334(h)(3)]

313 Submit excess emissions reports and monitor downtime in accordance with 40 CFR 60.7(c). Report excess emissions for all periods of unit operation, including startup, shutdown and malfunction. Subpart GG. [40 CFR 60.334(j)]

314 Determine compliance using the test methods and procedures specified in 40 CFR 60.335(a) through (c). Subpart GG. [40 CFR 60.335]

315 Comply with all applicable requirements of 40 CFR 60, Subpart KKKK, upon promulgation. NSPS KKKK. [40 CFR 60.4305]

### FG001      F-2 - Piping Component Fugitives

316 Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment. [LAC 33:III.2111]

### GRP003      GC-CAP1 - Compressor Engine CAP 1 (GC-1A/B & GC-2A/B)

317 Operating time <= 9636 hr/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if total hours of operation of the two compressors, GC-1A/B and GC-2A/B, exceeds the maximum listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: None specified

318 Operating time monitored by technically sound method as needed. Monitor hours of operation of each compressor to verify limit on total operating hours is not exceeded. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: None specified

319 Operating time recordkeeping by electronic or hard copy monthly. Keep records of the operating hours of each compressor and total hours of operation of the two compressors, GC-1A/B and GC-2A/B, for each month, as well as the total hours of operation for the last twelve months. Make records available for inspection by DEQ personnel. [LAC 33:III.501.C.6]

320 Submit report, Due annually, by the 31st of March. Report the total hours of operation of the two compressors, GC-1A/B and GC-2A/B, for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]

### GRP005      Facility - Egan Hub Partners LP - Egan Gas Storage Facility

321 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1303.B]

322 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]

323 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.219]

324 1,3-Butadiene <= 0.105 tons/yr. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: Annual maximum

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### GRP005 Facility - Egan Hub Partners LP - Egan Gas Storage Facility

- 325 Acetaldehyde <= 0.332 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 326 Acrolein <= 0.790 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 327 Benzene <= 1.453 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 328 2,2,4-Trimethylpentane <= 0.104 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 329 Ethyl benzene <= 0.146 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 330 Formaldehyde <= 2.146 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 331 Naphthalene <= 0.037 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 332 Nitrogen oxides <= 186.13 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 333 Particulate matter (10 microns or less) <= 13.59 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 334 Polynuclear Aromatic Hydrocarbons <= 0.015 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 335 Propylene oxide <= 0.054 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 336 Sulfur dioxide <= 4.52 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 337 Toluene <= 1.309 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 338 Xylene (mixed isomers) <= 0.685 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 339 Carbon monoxide <= 57.43 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 340 VOC, Total <= 88.13 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 341 2-Methylnaphthalene <= 0.010 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 342 n-Hexane <= 1.733 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 343 Methanol <= 8.001 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 344 Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.561.1, Tables 5, 6, and 7. [LAC 33:III.5609.A]

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### **GRP005 Facility - Egan Hub Partners LP - Egan Gas Storage Facility**

- 345 Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority. [LAC 33:III.5611.A]
- 346 During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations. [LAC 33:III.5611.B]
- 347 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]
- 348 Comply with all applicable requirements of 40 CFR 60, Subpart KKKK, upon promulgation. NSPS Subpart KKKK. [40 CFR 60.4305]
- 349 All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A. [40 CFR 60]
- 350 Throughput recordkeeping by electronic or hard copy annually. Maintain records of the annual facility natural gas throughput. Upon request, submit these records to DEQ. Subpart HHH. [40 CFR 63.1270(a)(3)]
- 351 Achieve compliance with 40 CFR 63 Subpart HHH 3 years after becoming a major source. Subpart HHH. [40 CFR 63.1270(d)(1)]
- 352 Do not shut down items of equipment that are required or utilized for compliance with the provisions of 40 CFR 63 Subpart HHH during times when emissions are being routed to such items of equipment, if the shutdown would contravene requirements applicable to such items of equipment. Subpart HHH. [40 CFR 63.1272(b)]
- 353 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in 40 CFR 63.1284(b) through (e). Subpart HHH. [40 CFR 63.1284]
- 354 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Appendix Table 2 of 40 CFR 63 Subpart HHH. [40 CFR 63]
- 355 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 356 Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 357 Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(B)
- 358 Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]

### **GRP006 GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)**

- 359 Operating time <= 24095 hr/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if total hours of operation of the five compressors, GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B, and GC-7A/B, exceeds the maximum listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 360 Equipment/operational data monitored by technically sound method continuously Monitor hours of operation of each compressor to verify limit on total operating hours is not exceeded. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified

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### **GRP006      GC-CAP2 - Compressor Engine CAP 2 (GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B & GC-7A/B)**

- 361 Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the operating hours of each compressor and total hours of operation of the five compressors, GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B, and GC-7A/B, for each month, as well as the total hours of operation for the last twelve months. Make records available for inspection by DEQ personnel. [LAC 33:III.501.C.6]
- 362 Submit report Due annually, by the 31st of March. Report the total hours of operation of the five compressors, GC-3A/B, GC-4A/B, GC-5A/B, GC-6A/B, and GC-7A/B, for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]